

Illinois SHA Fact Sheet

Top 20 standards cited by IL OSHA during fire department inspections in 2022-23

Hazardous Materials

1910.120(q)(6)(i) Responders do not receive initial hazardous materials awareness training.

Recommendation: See page 16 of IL OSHA's Fire Department Compliance Guide for more information. There are in-person and online options to provide awareness training.

1910.120(q)(8)(i) Responders do not receive annual hazardous materials refresher training.

Recommendation: Provide annual training, or conduct a drill to assess competency, at the level that members are expected to perform at for a response to hazardous materials.

Personal Protective Equipment

1910.132(d)(2) Department has not performed a personal protective equipment (PPE) hazard assessment.

Recommendation: Perform and certify a PPE hazard assessment using IL OSHA's sample PPE hazard assessment.

Respirators (SCBA)

1910.134(e)(1) No respirator medical evaluations for employees designated to wear respirators (SCBA).

Recommendation: Implement IL OSHA's sample respiratory protection plan.

1910.134(f)(2) No annual fit testing for employees designated to wear respirators (SCBA).

Recommendation: Implement IL OSHA's sample respiratory protection plan.

1910.134(c)(1) No written respiratory protection program.

Recommendation: Implement IL OSHA's sample respiratory protection plan.

1910.134(h)(3)(i) SCBAs are not maintained in accordance with manufacturer's recommendations.

Recommendation: Flow test SCBAs annually in accordance with manufacturer's recommendations. See page 47 of IL OSHA's Fire Department Compliance Guide for more information.

1910.134(i)(4)(i) SCBA cylinders have not been hydrostatically tested per US Department of Transportation (DOT) regulations, and/or composite SCBA cylinders are past their service life.

Recommendation: Most cylinders are manufactured under a US DOT Special Permit that specifies hydrotest intervals. In most cases, composite cylinders expire 15 years after the date of manufacture and must be hydrostatically tested every five years. Contact IL OSHA for additional assistance.

1910.134(h)(3)(iii) In-service SCBA cylinders are below 90% of the manufacturer's recommended pressure level.

Recommendation: Check in-service SCBA cylinder pressure regularly to ensure they are at or near 100% of recommended pressure (4500psi for a 4500psi cylinder). Fill cylinders slowly.

1910.134(k)(1) Members that are designated to wear SCBAs cannot demonstrate knowledge on SCBA donning, doffing, use, emergency procedures, etc.

Recommendation: Evaluate interior firefighters on SCBA donning, doffing, use, and emergency procedures during each required quarterly interior firefighter training session.

Fire Brigades Standard

1910.156(b)(1) Department does not have a basic statement on the types of services that they provide and/or does not have a training schedule.

Recommendation: Create a simple document that outlines the types and levels of services that the fire department provides. Create an annual training schedule using IL OSHA's Fire Department Compliance Guide as a reference (page 28).

1910.156(c)(1) Fire department leaders (officers, incident commanders) do not have training that is more comprehensive than that provided to rank and file members.

Recommendation: Implement an officer training program using IL OSHA's Fire Department Compliance Guide and IFSI's Minimum Fire Training Guide for reference.

1910.156(c)(2) No annual training and/or no quarterly interior firefighter training.

Recommendation: Review and implement a training schedule and training program using IL OSHA's Fire Department Compliance Guide for annual training reference and IFSI's Minimum Fire Training Guide for initial training reference. Require all interior firefighters to participate in quarterly training "on air."

1910.156(d) No annual inspection and maintenance of fire equipment.

Recommendation: Utilize equipment inspection checklists.

Bloodborne Pathogens

1910.1030(c)(1)(i) No written bloodborne pathogens exposure control plan.

Recommendation: Implement IL OSHA's sample BBP exposure control plan.

1910.1030(f)(2)(i) Department does not have documentation of Hep B vaccination or declination for responders.

Recommendation: Implement IL OSHA's sample BBP exposure control plan.

1910.1030(g)(2)(i) Responders do not have initial and/or annual training on bloodborne pathogens.

Recommendation: Implement IL OSHA's sample BBP exposure control plan.

1910.1030(f)(2)(iv) Department does not have Hepatitis B vaccine declination statements on file.

Recommendation: Use the declination statement in IL OSHA's sample BBP exposure control plan.

General Duty Clause

820 ILCS 219/20(a) Department violated IL OSHA's general duty clause that requires employers to provide employees with reasonable protection from hazards that cause or are likely to cause serious injury or death. This standard can be applied to many situations, but IL OSHA has issued several of these to fire departments that do not provide reasonable protection to interior firefighters during structure fires.

Recommendation: 1) Adopt an accountability procedure/guideline and ensure strict use of the Passport Accountability System for all structure fire training and all actual structure fires; 2) Adopt a mayday procedure/guideline and ensure 100% individual accountability of all personnel operating in the hazard zone of an incident during a "mayday" call and during a personnel accountability report; 3) Adopt an incident command procedure/guideline and ensure incident commanders train on and implement the procedure/guideline for all structure fire training and all actual structure fires; and 4) Ensure these and other fireground procedures/guidelines align with automatic and mutual aid partners procedures/guidelines and train on these policies with automatic and mutual aid partners.

Recordkeeping

56 IL Admin Code Part 350.260(a) Department does not maintain injury and illness records.

Recommendation: See page 34 of IL OSHA's Fire Department Compliance Guide for more information and use sample OSHA 300 injury and illness logs.

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