

**From:** Kambarian, Erik  
**To:**  
**cc:**  
**Subject:** Questions for IL OSHA re: Fire Departments  
**Date:** Tuesday, May 13, 2025 8:32:00 AM

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Hello Mr. Hickey,

Thank you for your questions. Please see below.

**Q.** Fire ground rehabilitation, although not specifically stated within osha standards. Is this considered a consensus industry standard, that would fall under general duty? Is rehabilitation required on emergency incidents and trainings?

**A.** Firefighter injury and death as a result of stress and overexertion during responses and training is a well-recognized hazard that would fall under IL OSHA's general duty clause that requires employers to provide reasonable protection from recognized hazards (820 ILCS 219/20(a)). Developing and implementing a model on-scene firefighter rehabilitation policy/SOP/SOG would be one way to provide reasonable protection.

In addition, 1910.156(b)(2) in the Fire Brigades standard requires the employer to, "assure that employees who are expected to do interior structural fire fighting are physically capable of performing duties which may be assigned to them during emergencies." Achieving compliance with this standard can be accomplished by periodic medical surveillance and/or physical performance tests. Compliance with 1910.156(b)(2) would reduce the risk of stress or overexertion related injuries by assuring interior firefighters are physically fit.

Lastly, 1910.134(e)(1) in the Respiratory Protection standard requires the employer to, "provide a medical evaluation to determine the employee's ability to use a respirator, before the employee is fit tested or required to use the respirator in the workplace." This standard applies to firefighters that wear respirators (SCBA). Please see our sample respiratory protection written plan for more information how to meet or exceed this standard.

**Q.** The other topic I was hoping to get clarification for is water rescue. Employees are supposed to receive training to the level they are expected to perform. Is having a firefighter don a water immersion suit and enter a body of water a technician level response? Since idol compares training to ifsi standards, are state certifications required prior to performing these types of operations? Also, I was curious about what training would be needed to operate along shore lines and to operate watercraft in emergency operations.

**A.** Unlike hazardous materials response (1910.120(q)), IL OSHA standards do not specify levels of competency for water rescue response. You are correct that the Fire Brigades standard requires the employer to provide training and education for members that is commensurate with the duties and functions they are expected to perform (1910.156(c)(1)),

and assure the training and education is conducted frequently enough, but at least annually, to assure that each member can perform the duties and functions satisfactorily and in a safe manner (1910.156(c)(2)). IL OSHA standards require that the quality of training provided is similar to the Illinois Fire Service Institute (1910.156(c)(3)), however, IL OSHA standards do not specifically require state certification for firefighters performing water rescue. IL OSHA would look to the level of risk involved for each activity within water rescue response as well as model training programs for levels and types of responses. For example, members expected to only operate on the shore line and not enter the water (low risk) would require much less training than members expected to perform swift water rescue and members expected to operate high speed watercraft (high risk).

Please remember that IL OSHA standards are the minimum for legal compliance. Fire departments would be well-served to ensure they exceed minimum legal requirements.

This response is for compliance assistance purposes and is not a new interpretation of standards. It will be distributed to IL OSHA enforcement managers and kept on file for internal reference. Please share and distribute freely.

Thank you,

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