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Sent: Friday, February 13, 2009 3:39 PM
To: NIOSH Docket Office (CDC)
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Subject: 141 - FFUS Comments

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Comments
Response to;
NIOSH "Preventing Deaths and Injuries of Fire Fighters When Fighting Fires in Unoccupied Structures"
February 2009

One of the first issues that must be clarified relative to this document and the accompanying recommendations is exactly what an "unoccupied" structure is. If you are talking about the structure described in Case #1 on page 4, which was described as a vacant, one-story wood frame dwelling that was abandoned and known by residents to be a "crack house", then you are talking about a dangerous structure where the risk to firefighters is high and where the incident commander must weight that risk against the value of this apparently valueless building. If you are talking about a one story private dwelling on a residential street that is normally in use, but we have not received any reports of people trapped, then we are talking about a totally different type of situation, where the incident commander will have to make a separate set of decisions concerning the risk that fire fighters maybe allowed to take to operate in this structure.

Let's look at these two different situations to measure the risk versus the reward. When fighting a fire in a structure that is a derelict, abandon structure where the owner no longer occupies or maintains the building, we are faced with an extremely dangerous and unknown environment. The fact that no people obviously live or work or occupy the structure for any reason should set of an alarm for the first to arrive fire fighters and incident commander. The structural conditions are at best unknown and at worst deteriorated, compromised and dangerous. There is no incident commander in the world that would be criticized for conducting a strictly defensive operation with fire fighters restricted to operating in established safe zones well away from the involved structure. Known vacant and derelict structures do not warrant any risk by fire fighters unless of course a person was known to have entered or been trapped inside, and even then the risk taken might have to be measured and limited. These structures need to be categorized as "vacant" or "Abandoned" so we can apply the most correct risk strategy to the operation.

When you are fighting a fire in a private home on a street full of normally and currently occupied houses you are facing a dramatically different situation. First and foremost, there is absolutely no way of knowing if there are any people trapped, sleeping or unconscious inside the house. You may have received a report of people trapped or you may not. You may be told by neighbors that the occupants are home or you may not. You may observe a car in the driveway or you may not. There is no way of determining if this house is occupied, period. But most fire departments will launch an aggressive interior attack to enter the house, extinguish the fire and locate and remove any occupants that are found. We have not even talked about the volume of fire or its location in the structure. We haven't mentioned the fire departments capabilities and limitations. There are many other factors that need to be addressed and considered when we are making this important risk vs reward decision. But let's not get too far away from the point here, which is that this is a normally occupied house that we have no

further information about relative to people being at risk inside. Additionally, there is a great chance that people are inside and need us to risk ourselves to rescue them because people normally enter and remain in their homes overnight as a habit. This is not an unoccupied structure. With the information that we have, which is limited, this needs to be treated as an occupied structure. The statement on page 1 which states, "Unoccupied structures, whether in current use, under construction, under renovation, or condemned, must be considered expendable in order to decrease the risk to fire fighters".

Again I reject the idea that a building which is "currently in use" is unoccupied. I will restate my point here, that no incident commander can tell me if a house, or store or school is unoccupied.

Another point that is stated in this report is on page 2 where the following statement is made relative to the 71 trauma-related incidents at structural fires where 96 fire fighters died and 106 were injured; "Fifty-four of the 71 incidents occurred in unoccupied structures"

The problem with this fact is that it is post incident information. Only after the fire is extinguished and the search results are known can we say that these structures were unoccupied. When the fire department arrived at the scene of these 71 incidents, we did not know if there were people in danger within the involved structures. You cannot take post incident conclusions and retroactively apply them to your very first risk assessment decision. Sure it easy to examine all the post fire facts and determine that no people were at risk so the injuries sustained by the operating fire fighters were not only unnecessary but unjustified. But this is invalid. Most fire departments arrive at burning buildings with very little information other than what was received in the initial report and what they can see when they arrive. It is unfair and improper to apply information uncovered by operating fire fighters retroactively back to their decision to enter the structure initially.

When you state that "No offensive interior attacks should be made in unsafe structures" I agree. But you cannot then add word "unoccupied" and keep that statement valid.

Let's focus our efforts here on keeping fire fighters safe and alive by limiting or eliminating operations in unsafe or vacant structures. Let's look seriously at all of the other contributing factors that often accompany fire fighter injuries and fatalities, as you so often do in your investigations, and not single out whether the structure may or may not be "unoccupied" as the singular or primary factor when deciding whether to have fire fighters enter these structures and assume an operational risk in doing so.

Thank you,

John J. Salka, Jr.
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