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NMC Policy Ltr. No. 10-99
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From: Commanding Officer, National Maritime Center
To: Distribution

Subj: FIRE FIGHTING TURNOUT GEAR FOR LIVE FIRE TRAINING

Ref: (a) 46 CFR 35.30-20
(b) 46 CFR 77.35
(c) 46 CFR 96.35
(d) NFPA Standard 1971 (revised in 1997)

1. Purpose. This policy letter clarifies the requirements for fire fighting turnout gear and its use during live fire training exercises, other than fire extinguisher training, at Coast Guard approved fire-fighting courses. For the purposes of this letter, the terms fire fighting turnout gear, firefighter's outfit, fireman's outfit, fire fighting personal protective clothing, and fire fighting ensemble are synonymous.

2. Background.

a. References (a) through (c) specify the components of personal protective clothing to be carried aboard ship and used by mariners during fire fighting engagements beyond the initial stage during which only portable fire extinguishers are effective. In particular, the references require protective clothing to be made of a material which protects the skin from the heat radiating from the fire, and from burns and scalding by steam and further, with an outer surface that is water-resistant.

b. The technology of fire fighting turnout gear materials and construction has advanced significantly. Work by the National Fire Prevention and Control Administration (now, United States Fire Administration), the National Bureau of Standards (now, National Institute of Standards and Technology), the United States Air Force, the United States Navy, the National Fire Protection Association (NFPA), and the protective clothing industry significantly raised the performance of fire fighting turnout gear by the late 1980s.

c. As these advances were made, ship owners and operators began providing their crews with state-of-the-art fire fighting turnout gear as older gear was replaced. As a result, the U.S. merchant fleet is typically equipped with fire fighting turnout gear meeting the requirements of the reference (d) as the means of complying with the requirements of references (a) through (c). Navigation and Vessel Inspection Circular (NVIC) 9-99, *Protective Equipment Required for Firefighter's Outfits*, recognizes this and states that fire fighting turnout gear meeting the requirements of reference (d) is acceptable for meeting all U.S. and international requirements.

d. In accordance with accepted principles of instructional methodology, the Coast Guard requires classroom instruction and practical exercises associated with approved or accepted training to

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employ equipment found onboard merchant ships. In addition to instructional considerations, the safety of the student is of great concern.

3. Action.

a. Within 6 months, each training facility providing field exercises for any Coast Guard approved fire fighting course is to:

- (1) Furnish each student with protective fire fighting turnout gear meeting the requirements of references (a) through (c) during each and every live fire exercise designed for fighting fires beyond the initial stage. Protective fire fighting turnout gear meeting the requirements of reference (d) is acceptable, in accordance with NVIC 9-99;
- (2) Include an approved self-contained breathing apparatus as part of the fire fighting turnout gear for exercises involving interior structural fire fighting; and,
- (3) Insure that students and staff use all furnished fire fighting turnout gear correctly, only for its intended purpose, and in a manner that will provide the fullest protection.

b. The need for and use of fire fighting turnout gear by students and staff is optional for live fire exercises involving fire extinguishers to teach suppression techniques for the initial stage of fighting fires.

c. The use of fire fighting turnout gear by students and staff does not apply to Coast Guard approved Tank Barge Fire Fighting Courses.

d. Enclosure (1) is a draft change to the Marine Safety Manual which incorporates this policy as new paragraph 7.F.2. on page 7-9.

M. S. Boothe

Distribution: All District Commanders (m)
 Commandant (G-MSO)
 Commandant (G-MOC)
 All MSO Commanding Officers
 All Activity Commanders
 All RECs

Encl: (1) Change to Chapter 7, MSM Vol. III

CHANGE TO MARINE SAFETY MANUAL, VOL.III

Insert new Paragraph 7.F.2.

2. Firefighting Turnout Gear.

In accordance with accepted principles of instructional methodology, the Coast Guard requires classroom instruction and practical exercises associated with approved or accepted training to employ equipment found onboard merchant ships. In addition to instructional considerations, the safety of the student is of great concern.

- a. Each training facility providing field exercises for any Coast Guard approved fire fighting course should:
 - (1) Furnish each student with protective fire fighting turnout gear meeting the requirements of references (a) through (c) during each and every live fire exercise designed for fighting fires beyond the initial stage. Protective fire fighting turnout gear meeting the requirements of reference (d) is acceptable, in accordance with NVIC 9-99;
 - (2) Include an approved self-contained breathing apparatus as part of the fire fighting turnout gear for exercises involving interior structural fire fighting; and,
 - (3) Insure that students and staff use all furnished fire fighting turnout gear correctly, only for its intended purpose, and in a manner that will provide the fullest protection.
- b. The need for and use of fire fighting turnout gear by students and staff is optional for live fire exercises involving fire extinguishers to teach suppression techniques for the initial stage of fighting fires.
- c. The use of fire fighting turnout gear by students and staff is does not apply to Coast Guard approved Tank Barge Fire Fighting Courses.

ENCLOSURE (1)