



August 2, 2016

The Honorable Thomas E. Perez
Secretary
United States Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Dear Secretary Perez:

On behalf of the International Association of Fire Fighters and the National Volunteer Fire Council, representing America's professional and volunteer fire fighters and emergency medical personnel, we are writing to encourage you to update OSHA's standard for the storage and handling of flammable and combustible liquids. Specifically, we urge you to update 29 CFR 1910.106(d) to incorporate the most recent version of the National Fire Protection Association Flammable and Combustible Liquids Code, NFPA 30.

OSHA's standard is based upon the 1969 edition of NFPA 30 and, as such, is woefully out of date. Since 1969, NFPA 30 has been revised fifteen times, most recently in 2015. This is significant, as there have been many advancements in research and technology in the ensuing years, including changes to sprinkler systems and containers for storing flammable and combustible liquids. Furthermore, the current standard is silent on important issues such as the fire performance of containers used to store ignitable liquids and electrostatic ignition risk during filling operations.

OSHA's outdated standard poses an unacceptable life safety risk for facility occupants, the surrounding population, and emergency responders. This risk also extends to potential environmental damage and surrounding properties.

OSHA's reliance on the 1969 version of NFPA 30 also is inconsistent with building and fire prevention codes in more than thirty states. This disconnect leads to confusion in the workplace, which further compromises safety.

We urge you to update §1910.106(d) so that it incorporates the most recent edition of NFPA 30. The lives of first responders, workers, and other Americans should not be placed in jeopardy due to an outdated workplace safety standard based on a fire code written more than four decades ago.

Thank you for your consideration, and for your continued commitment to the safety of America's first responders.

Sincerely,

Harold A. Schaitberger
General President
International Association of Fire Fighters

Kevin D. Quinn
Chairman
National Volunteer Fire Council