



CITY of

PORT LAVACA

FIRE DEPARTMENT

Jody,

Below is a brief summary regarding the two additional firefighter positions and the impact they have had on department operations.

Original Need and Justification

Prior to the addition of the three firefighter positions, staffing levels created difficulty consistently meeting the 2-in/2-out requirements for interior structural firefighting. This presented both an operational limitation and a firefighter safety concern.

Even when four firefighters were available to establish two personnel inside and two outside, additional essential functions still had to be performed, including dedicated incident command and apparatus/pump operations. At times, available staffing limited our ability to initiate interior fire attack until additional personnel arrived.

Staffing shortages also resulted in increased overtime expenses as personnel had to be called in or held over to maintain adequate daily staffing and cover vacation, sick leave, training, and other absences.

Benefits and Positive Outcomes of the Additional Staffing

The addition of one firefighter position to each shift has provided greater flexibility in maintaining adequate staffing while reducing our dependence on overtime.

Personnel are now better able to utilize vacation and other leave without routinely creating staffing shortages or requiring another employee to work overtime. This has improved morale and work-life balance.

The additional staffing also allows personnel to attend necessary training and professional development without hindering daily operations or routinely creating additional overtime expenses to maintain staffing.

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Operationally, the additional staffing has improved our ability to establish the required 2-in/2-out configuration while maintaining personnel for incident command and apparatus operations. This allows crews to conduct more timely, effective, and safer interior firefighting operations.

Impact if the Positions Are Eliminated

Eliminating the three positions would effectively remove one firefighter from each shift and return the department toward the staffing conditions that originally justified adding the positions.

Reduced staffing would likely result in increased overtime expenses and greater difficulty covering vacation, sick leave, training, and other personnel absences without negatively affecting daily staffing.

It would also reduce the personnel available to perform fire inspections, public education and community relations events, training, and other non-emergency responsibilities while maintaining adequate emergency response coverage.

Most importantly, reduced on-duty staffing would increase the likelihood that crews arrive at structure fires without enough personnel to simultaneously establish 2-in/2-out, operate the apparatus, and provide dedicated incident command. This could delay interior firefighting operations until additional personnel arrive and create less efficient and potentially more hazardous fireground operations.

Overall, the addition of these three positions addressed an existing staffing deficiency. Eliminating them would not simply reduce current staffing capacity; it would reintroduce many of the operational, safety, overtime, and personnel issues that led to the positions being added in the first place.

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Sec. 419.046. FIRE PROTECTION PERSONNEL OPERATING AT EMERGENCY INCIDENTS. (a) A fire department shall develop, maintain, and use a standard operating procedure covering fire protection personnel operating at emergency incidents. The procedure shall specify an adequate number of personnel to safely conduct emergency scene operations. The procedure shall limit operations to those that can be safely performed by the personnel available at the scene.

(b) A fire department shall require all personnel to be trained in and to use the standard operating procedure pertaining to fire protection personnel operating at emergency incidents.

(c) The minimum standards established by the National Fire Protection Association or its successor for operating procedures for fire protection personnel operating at an emergency incident may be used as a guideline for fire departments when developing standard operating procedures.

(d) The standard operating procedures for structure fires shall comply with the Occupational Safety and Health Administration's Final Rule, 29 C.F.R. Section 1910.134(g)(4), procedures for interior structural fire fighting of July 1, 1998.

Added by Acts 2001, 77th Leg., ch. 1241, Sec. 9, eff. Sept. 1, 2001.

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Title 37	PUBLIC SAFETY AND CORRECTIONS
Part 13	TEXAS COMMISSION ON FIRE PROTECTION
Chapter 435	FIRE FIGHTER SAFETY
Rule 5435.17	Procedures for Interior Structural Fire Fighting (2-In /2-Out Rule)
Previous Rule	View Rule
Next Rule	View Rule
Chapter Review Date	07/26/2023

(a) The regulated entity shall develop, maintain, and comply with written standard operating procedures that adhere with the Occupational Safety and Health Administration's Final Rule, 29 CFR Section 1910.134(g)(4) by requiring:

(1) a team of at least four fire protection personnel must be assembled before an interior fire attack can be made when the fire has progressed beyond the incipient stage;

(2) at least two fire protection personnel to enter the IDLH atmosphere and remain in visual or voice (not radio) contact with each other;

(A) visual means that the fire protection personnel must be close enough to see each other; and

(B) voice means that the fire protection personnel of the entry team must be close enough to speak to one another without the use of radios;

(3) at least two fire protection personnel remain located outside the IDLH atmosphere to perform rescue of the fire protection personnel inside the IDLH atmosphere;

(4) all fire protection personnel engaged in interior structural fire fighting use self-contained breathing apparatus and be clothed in a complete set of protective clothing as identified in Chapter 435;

(5) all fire protection personnel located outside the IDLH atmosphere be equipped with appropriate retrieval equipment where retrieval equipment would contribute to the rescue of the fire protection personnel who have entered the IDLH atmosphere;

(6) one of the outside fire protection personnel must actively monitor the status of the inside fire protection personnel and not be assigned other duties. The second outside fire protection personnel may be assigned to an additional role, including, but not limited to, incident commander, safety officer, driver-operator, command technician or aide, or fire fighter/EMS personnel, so long as this individual is able to perform assistance or rescue activities without jeopardizing the safety or health of any fire protection personnel working

at the scene;

Source Note: The provisions of this §435.17 adopted to be effective March 24, 2002, 27 TexReg 2242;