

# FIRE COUNSEL NOTES



Re: Docket No. OSHA-2007-0073

(89 FR 7774):

Comments Regarding the  
Proposed Emergency Response Standard

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The following Comment has been submitted to the United States Occupational Health and Safety Administration on behalf of the Membership of the Illinois Association of Fire Protection Districts. Association Legal Counsel prepared the Comment to present to US OSHA the negative effects which the rule, if adopted, would have on Illinois Fire Protection Districts. The full Comment is reprinted here for the benefit of member districts to better inform them of the impact that this rewriting of the current OSHA fire brigade rules will have on the Fire Protection Districts of Illinois. This is another example of how the Association works to protect the interests of its members.

## INTRODUCTION

The Illinois Association of Fire Protection District is a statewide organization which represents over 600 of the 800 plus fire protection districts in the State of Illinois. The IAFFPD focuses on the interests, rights, and privileges of fire protection districts as affected by legislative, administrative, and/or judicial action. Under Illinois law, fire protection districts are special units of local government organized and governed by the Illinois Fire Protection District Act (70 ILCS 705). While their primary purpose is the provision of fire protection and rescue services within their jurisdictional boundaries, many fire protection districts also provide emergency medical services (EMS) ranging from non-transport Emergency Medical Responders (EMR) (commonly referred to as "First Responders") to Advanced Life Support (ALS) full paramedic ambulance

transport service to their communities. In addition to advocacy efforts, the IAFFPD also provides educational opportunities and resources to the fire protection districts in Illinois to ensure that they are well-equipped and administered to provide firefighting and emergency services. Association Member Districts range from large all-career fire departments to small all-volunteer operations. Regardless of their size or scope of operations, all of the Association's members will be significantly affected by OSHA's proposed rule.

The purpose of this Comment is to identify and discuss those provisions of the proposed rule which are of the greatest concern to the IAFFPD membership and to suggest modifications to any rule which is finally adopted by OSHA. While firefighter safety is of the highest priority within the IAFFPD membership along with the protection of the public, OSHA's proposed regulation fails to consider the potentially existential impact the rule will have on fire service providers like our Association's members. Moreover, it is the Association's belief that the current version of the rule, as published, will not effectively achieve the goals that OSHA intends to accomplish. Therefore, we ask that you consider the following points:

## OSHA'S FALSE DICHOTOMY

OSHA's proposed rule begins, unfortunately, with a false dichotomy. Throughout the proposed rule, OSHA opines that the rule, if adopted, will not apply to the volunteer fire service, which, as OSHA is well aware, provides the greatest part of fire protection in the country.

While there are multiple reasons, discussed later in this comment, why this dichotomy is incorrect, a more fundamental objection is that it necessarily infers that the safety of volunteer fire service personnel is of less importance than that of career, part-time, and paid-on-call firefighters. Even where OSHA's contention that its proposed rule will not affect most volunteer fire service providers, placing the safety of one group of firefighters over that of another is an unacceptable starting point for OSHA's proposed rule. The safety of all firefighters is a paramount concern of all fire service providers regardless of size, form of organization, or personnel composition.

## OSHA'S FLAWED USE OF "INCORPORATION BY REFERENCE" ("IBR")

The new OSHA regulation proposes incorporating by reference 22 NFPA standards and using 14 other NFPA standards as "guides" for its new rule. This incorporation includes over 1,500 "shalls" and "musts," resulting in 1,500 new requirements that the fire service organizations subject to the new rule must not only become familiar with and have a working knowledge of, but with which they must also absolutely comply. Going forward, these organizations will necessarily be found to be in violation if they do not comply, and they will face both fines and the very real prospect of being shut down altogether because they are unable (and will never be able) to comply with the mandates of the new rule.

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Incorporation by reference (“IBR”) is a flawed approach. If adopted, the new rule will require fire service organizations to search out at least two sources to ascertain what the rule is: the regulation itself, in the Code of Federal Regulations, and second, the NFPA standard which is outside the C.F.R. OSHA blithely assumes that each organization has ready access to these codes. While it is true that NFPA currently offers a free online platform to view these codes, it is limited to a “read-only” function. This type of access might suffice for a quick review or for technically proficient users, but those needing hard copies of these codes will be forced to purchase each edition from the NFPA’s website. On average, each code book costs around \$150. To purchase all the codes included in the proposed regulation, organizations would incur costs between \$3,000 to \$5,000. This does not, of course, count the cost of maintaining an updated library of the NFPA codes as they are modified over time.

Using the IBR approach also allows OSHA to ignore the reality that NFPA standards, however laudable, are still industry standards. Which industries? At least in part, the industries which generate substantial revenues from the sale of fire equipment to fire service organizations. In using IBR, OSHA is facilitating, perhaps unknowingly, this plain reality that standards like NFPA drive profits.

Perhaps even more troubling is that the use of the IBR approach allows OSHA to escape the hard work of analyzing the NFPA standards to determine how or whether the “industry” standards will work when applied as rules to govern the operations of fire service organizations from the largest to the smallest throughout the United States. The approach ignores consideration of the different circumstances presented in the application of such industry standards in a large career metropolitan fire department versus a small rural department using all volunteer personnel. Given that OSHA’s own jurisdiction over fire service operations does not by statute extend to state and local governments, making its experience largely limited to private, industrial settings (such as refineries),

its experience and ability to promulgate regulations for the public fire service are open to question. It is far easier for the private sector service providers to cross reference a C.F.R. entry to an NFPA reference and to decipher what the actual “rule” is, this is far less likely to be the case for a public fire service provider with both limited financial resources and personnel. Unlike the private sector providers which can ultimately pass regulatory compliance costs on to its customers, public sector providers like Illinois fire protection districts which operate under tax limits, cannot simply generate more revenue to pass these costs through to its customers – the public.

These standards are impracticable for many of the operating fire services in Illinois. NFPA standards will sunset equipment without evaluating it for its quality or usability. For example, small districts that may have only used a set of personal protective gear a very few times will be forced to retire it and purchase new gear since it will “time out” under the NFPA standards. Such provisions result in a waste of resources and unnecessary spending. As noted elsewhere, governmental organizations like the IAFFPD’s members are already limited in their available hours and manpower. Conducting an in-depth analysis of the proposed requirements will be an undue burden for most of these organizations. Furthermore, organizations that are not already following the proposed new requirements will be forced to allocate additional time, resources, and personnel to develop and implement such standards. The OSHA estimations of time and cost of compliance are unrealistic and are not reflective of the actual existing supply of resources.

A further difficulty created by OSHA’s IBR approach is that it is premised on standards which are promulgated on the assumption that the fire and emergency service organizations which are required to follow the standards have unlimited financial resources to meet the requirements of the standard. The standard is set and directs, in effect, the regulated entities to fund the standard without regard as to how that funding will be achieved. This is a wholly unrealistic approach. While NFPA standards may reflect the “best practice” and set a “gold standard” for fire and emergency

operations, they also assume full funding and, in effect, unlimited funding. OSHA, by adopting those standards with no realistic allowance or flexibility for cost constraints, ignores the reality of local government in states like Illinois.

Additionally, as OSHA acknowledges, NFPA is currently undergoing a consolidation and amendment process with its codes. The inevitable result will be that the code references at the end of NFPA’s reconstruction period will not match those used by OSHA when publishing the proposed regulation. How does OSHA intend to handle such changes in the underlying industry standards it proposes to use? Will it engage in a constant amending process to correlate the NFPA references in the regulation or will it automatically “incorporate by reference” any changes in the NFPA structure? Regardless of the approach taken, confusion will result. Fire service organizations should be entitled to go to one source, the Code of Federal Regulations, to find the regulations which are being applied to them. They should not be put to toggling between multiple sources and spending inordinate amounts of money to purchase the regulatory documents. This ongoing process will likely cause further confusion and frustration among readers about the applicable standard, thus imposing an additional burden on organizations to continually adjust.

### UNREALISTIC COST ESTIMATIONS

OSHA’s cost estimates for compliance are unrealistic. In particular, the OSHA estimations do not take into account the non-pecuniary compliance burden placed on unpaid or nominally paid fire personnel who staff the majority of fire service providers. Without question, many of the additional compliance requirements will require an expenditure of time and effort. This will be particularly true with respect to documentation and recordkeeping, discussed later in this Comment. To the extent that the responsibility for this additional compliance falls on fire chiefs and fire officers, fire service organizations operating in the unpaid or nominally paid sector will likely face attrition of qualified personnel. This will in all likelihood mean

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that compliance will suffer, or in some cases, be nonexistent. That, in the long term, will mean that regulators will be forced to curtail or even shut down the operations of fire departments. This will, of course, have the consequence of reducing fire protection and, in some places, leaving the public and property entirely unprotected. This is not an acceptable result, but it is one that may very well become a reality in many areas if OSHA's proposed rule is adopted.

On the financial side, OSHA states that its estimated average cost of compliance for State Plan entities ranges from \$14,397.00 - \$15,389.00. However, OSHA's estimates completely overlook the financial realities of many of the fire service organizations which will be subject to the proposed rule. The revenue streams and operational expenses of many, if not most, fire protection districts will be stressed by the cost of compliance, even if OSHA's cost estimates are correct. The cost projections primarily account for recordkeeping expenses, neglecting the substantial costs associated with equipment, apparatus, and training needed to meet NFPA standards. For instance, in Illinois, fire protection districts derive their primary operating revenue from real estate property taxes, which are assessed based on a district's equalized assessed value (EAV) for each tax year. Illinois fire protection districts do not receive state sales or income tax revenues. Most districts are at, or very near, the state law limits on tax levies. Consequently, even with growth in their assessed values, these districts cannot generate the additional funds anticipated by OSHA. Beyond that, a great many fire protection districts in Illinois are subject to the strictures of the Property Tax Extension Limitation Law (PTELL) which further constrains the districts from increasing their tax levy even when their assessed value grows. Many larger districts (in terms of assessed value) in the suburban areas of Chicago are already at their spending limits due to property tax limitations. Rural areas in many parts of the State typically have significantly lower EAVs compared to larger suburban areas. For those districts, even if OSHA's cost estimates are accurate, a \$15,000 compliance cost manageable

for high-revenue organizations would represent a substantial financial burden, exceeding the resources of many smaller districts.

Additionally, all fire protection districts, regardless of size, face ongoing escalating operational and capital expenses. The costs associated with essential equipment, such as pumpers, trucks, and gear, has escalated sharply in the post-COVID period. For instance, in 2016, an NFPA compliant fire pumper might have cost approximately \$200,000, whereas today, the price has soared to around \$450,000 or more. Many budgets are already stretched thin with day-to-day expenses, leaving little to no room to accommodate the purchase of such equipment. As a result, these organizations often rely on community fundraising events to supplement these purchases. For districts with career personnel, wages, benefits, and mandated pensions have continued to outpace available financial resources – particularly in areas of the State which are tax-capped. These factors underscore the financial strain experienced by fire service organizations in Illinois, a concern that OSHA has not adequately recognized or addressed in its proposed imposition of the new rule.

OSHA has not, of course, proposed any additional funding to meet the new compliance requirements of the proposed rule. It is also improbable that either the federal or state governments will offer additional financial support. While Federal OSHA asserts that the regulations are not an unfunded mandate, this flies in the face of the reality of the effect of the rule in State Plan States. State agencies in those States, including Illinois OSHA, will be obligated to enforce these standards. Consequently, the new regulations will obviously impose wholly unfunded mandates that may potentially lead to numerous emergency service providers ceasing operations entirely.

### **UNREALISTIC REQUIRED DOCUMENTATION AND RECORDKEEPING**

Unlike the existing Fire Brigade standard, the Proposed Emergency Response Standard will introduce additional substantial new recordkeeping responsibilities for emergency service organizations such as fire protection

districts. Required tasks will include creating, reviewing, and implementing a written emergency response plan, a written pre-incident plan for all high or special risk properties, a written risk management plan, and a community vulnerability and risk assessment for service areas. OSHA estimates the initial setup of these requirements will take about 92 hours, with an additional 43 hours needed for annual review. However, this approximation likely underestimates the actual time required, as some organizations may lack the capability or necessary expertise to execute each task within OSHA's time estimates and in the case of unpaid or nominally compensated departments, OSHA's time estimations create a burden on personnel which is unrealistic.

Time is already a scarce resource in the fire service community, particularly in the volunteer, part-time, and paid-on-call settings, but also in the career setting in states like Illinois, where fire service organizations have been forced to take on additional responsibilities such as emergency medical services. While some organizations may already have procedures in place that align or meet the proposed regulation, many of the new requirements will impose excessive demands on organizations lacking sufficient hours and manpower to implement the new regulations related to documentation of exposures and follow up medical evaluations and treatment. This will significantly strain their resources, impacting their ability to fulfill their primary emergency response duties. In some situations, regulators such as Illinois OSHA may find themselves forced to shut down fire and emergency service providers simply due to their inability to meet these new recordkeeping mandates.

### **DEMANDING NEW TRAINING, OPERATIONAL, AND MAINTENANCE REQUIREMENTS**

The new proposed standard introduces significant requirements for training and maintenance testing. Under the revised regulations, annual truck training will now require mandatory Department of Transportation and chassis inspections conducted by certified personnel. Most departments or districts are unlikely

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to have staff with these qualifications, necessitating the engagement of external inspectors if their own personnel are not certified. Additionally, the new regulation mandates annual brake testing for all trucks and apparatus, which requires access to testing facilities and temporarily removes vehicles from service. This poses a risk for organizations with limited resources, as their apparatus may not be available for emergencies during this time. The proposed regulation stipulates annual medical exams for personnel exposed to products of combustion 15 or more times. However, OSHA does not clarify how the threshold of 15 was determined or adequately define "exposure to products of combustion." Despite FEMA offering grants of \$1,200 to \$1,400 per medical exam, actual costs are expected to exceed this amount. Consequently, organizations are likely to be required to increase the number of medical examinations even for minor exposures, further escalating the costs and burdens these providers will face.

Illinois OSHA (Illinois Department of Labor) has identified in its review of the proposed rule at least the following requirements which will directly impact all Illinois fire protection districts:

- A written Emergency Response Plan that meets 14 additional requirements will be mandated.
- Departments will be required to conduct Community Vulnerability Assessments which will include identification of structures needing a pre-plan and vacant structures.
- A written Risk Management Plan will be required.
- Emergency responder tier classifications will be required with annual evaluations of personnel.
- Health and Fitness Program and Fitness Assessments will be required.
- A complete initial medical evaluation will be required, along with subsequent required medical reevaluations at set intervals. (At the district's expense)
- Personnel exposed to combustion products more than 15 times per year must receive a special evaluation based on NFPA 1582.

- Training must include annual skill checks and must include particular topics including risk management, health and safety policies, incident management, accountability, CPR and AED skills.
- Interior firefighters, vehicle operators, officers, marine operations personnel, technical rescue teams, etc. must all meet NFPA standards (or equivalent) in each of these areas.
- New station facilities must meet requirements such as sprinklering.
- There must be decontamination, disinfection, and cleaning facilities in all stations.
- Sleeping areas must have smoke and carbon monoxide alarms.
- PPE, vehicle, and pump inspections will have to meet NFPA standards.
- Incident medical monitoring and rehabilitation will be required.
- Standard Operating Procedures (SOPs) will have to be prepared and meet required content standards to comply.

Because OSHA assumes that the impact of its rule will not be applicable to a large portion of the fire service (the volunteer service), it is able to completely ignore how unrealistic the foregoing mandates will be in states like Illinois in which virtually all fire service organizations will be subject to the new rule.

### THE "VOLUNTEER" VERSUS "EMPLOYEE" DISTINCTION IS UNTENABLE

As noted earlier in this Comment, OSHA has based a large part of its justification for the proposed new rule on its assertion that it will be inapplicable to volunteer fire and other emergency services. It does this by drawing a distinction between persons in the emergency services who are considered to be volunteers and those who are not. According to OSHA, providers operating with volunteers would not have to comply with the new rule. Setting aside for the moment the questionable position of treating firefighter safety differently for volunteers as compared to career personnel, this distinction will not exist and serve as a basis to exclude volunteer organizations in states such as Illinois which by state law and State Plan participation do not make that distinction and instead treat all persons engaged

in fire protection and other emergency services on the same footing regardless of the status of their personnel as volunteer or employee. In Illinois, all fire service agencies are held to the same standard as private entities, and no volunteer exception exists. OSHA's statement that "some workers labeled as volunteers may actually be considered employees under Federal Law because they receive a certain level of compensation...OSHA believes that volunteer emergency responders rarely receive compensation substantial enough to render them employees under this 'significant remuneration' legal test and thus OSHA does not expect many emergency responders will fall into this category" (20 F.R. 7799) will clearly not be applicable in Illinois and other State Plan States.

Moreover, even if in states like Illinois, a distinction could be made based on volunteer versus employee status, how would regulation over departments or organizations that combine volunteer and career firefighters be accomplished? During inspections, would inspectors find matters applicable to full-time career firefighters in violation, while overlooking volunteers? Despite differences in classification, both groups perform high-risk duties. The focus should therefore be on a risk-based approach rather than on compensation distinctions. Otherwise, the standards currently imply that the lives of career personnel are more valuable than those of volunteers, which cannot be OSHA's intention.

### OSHA'S PROPOSED RULE EFFECTIVELY SIDESTEPS STATE PLAN JURISDICTIONS

Federal OSHA repeatedly asserts that the new rule will not apply to "non-employee" fire departments and organizations. However, as discussed above, in states like Illinois, this is not a relevant distinction and there is little serious treatment by OSHA regarding how this assertion applies to states operating under a "State Plan" jurisdiction. State Plans require that OSHA coverage include state and local government employees. Illinois is one of the 22 states operating under such a plan. Under OSHA-approved State Plan programs, workplace procedures must match or

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exceed OSHA standards. Therefore, even if there is an exception to “non-employee” organizations, the new OSHA regulation will apply in Illinois and other states which apply their workplace standards to all emergency service providers.

### COMPLIANCE TIMING AND LACK OF ADEQUATE REGULATORY FLEXIBILITY

Based upon our understanding of the proposed standard, Illinois OSHA will be required to implement the new OSHA rule within six months of the date the final version is adopted. This time period creates a wholly insufficient and unrealistic time period for implementation of the new requirements imposed by the proposed rule by fire and emergency service providers. There is no built-in phase-in period which would allow State Plan regulators to afford a reasonable amount of time for implementation without placing their own status with OSHA in jeopardy for non-enforcement of the federal OSHA standards. The time for public comment alone has been extended twice, further evidencing the underestimation of the length and depth of analysis required for this proposed regulation. We believe that the time period needed for implementation must be addressed by OSHA.

Beyond the time need for implementation, the new rule contains no provisions for ongoing regulatory flexibility by State Plan regulators. This is partly due to OSHA’s flawed assumption, mentioned many times in this Comment, that its new rule will not apply to much of the fire and emergency service. Because of this flawed assumption, OSHA clearly does not perceive a need for flexibility in applying the strict standards as written in the new rule and as incorporated by reference from the NFPA standards. Yet, even a cursory reading of these standards reveals that they provide no room for necessary flexibility. Instead, they take a “command” approach in which “shall” or “must” are the operative verbs. While OSHA and the writers of the NFPA standards may believe that this maximizes firefighter and emergency responder safety, it may also simply lead

to substantial noncompliance and result in far fewer providers in the long run with a drastic reduction in fire protection and community safety. If OSHA proceeds to implement this new rule, it must revise it to afford adequate enforcement flexibility, making it feasible for a large portion of the fire and emergency service community to accept and comply with.

### MEMBER SURVEY AND SUMMARY OF CONCERNS

Following the issuance of the proposed rule by OSHA and the provisions of information about the new rule to its membership, the Association conducted a survey among its members to gather feedback on how the proposed regulation would impact individual organizations. Attached to this Comment are the questionnaire responses, however, the following is a summary of concerns expressed.

Recipients were asked a series of questions regarding the potential impact and cost of implementing the proposed regulation on their specific districts. Nearly all responses highlighted concerns about manpower and the availability of hours. Even in districts where finances were not a paramount issue, representatives noted that compliance could not be met without personnel willing to perform the tasks. Recruitment and retention in the volunteer fire service is already a serious issue with participation declining rapidly, and adding cumbersome, time-consuming tasks will further deter potential volunteers. As one representative pointed out, many volunteers are either retired or currently have full-time jobs. The hours they devote to volunteering already take away from time they could spend with their families. Many current volunteers have shared with their district representatives that they are likely to retire if these proposed regulations are implemented. Should these volunteers cease their involvement, many districts would have to shut down or severely curtail operations. Alternatively, combination districts that consist of both volunteer and full-time career firefighters would be compelled to transition into a full-career force, significantly increasing their budgets to support a fully compensated roster. In turn, these districts will not only have to increase compensation budgets, but also provide additional paid medical

examinations and training programs to meet the new requirements. The new regulations present a paradoxical situation in which all districts, regardless of their compensatory status, will experience inevitable detriments.

In addition to staffing challenges, many districts noted the extensive measures required to comply with the new regulations. Currently, many organizations possess equipment that fails to meet NFPA standards simply due to age. However, much of this gear has spent the majority of its life resting on a shelf rather than being used in active service. Despite this, districts would be compelled to retire such equipment and incur significant expenses to purchase compliant gear, only to face the same predicament when NFPA updates its standards in the future.

Moreover, the cost of new gear pales in comparison to the expense of acquiring new apparatus, such as pumpers and tankers. As one respondent noted, their district would incur over a million dollars to purchase a new engine and pumper. The current market and post-COVID prices do not offer fire service providers a feasible means of acquiring adequate equipment. Instead, the market has placed high prices tags that are drastically disproportionate to the consumer’s (fire and emergency service providers) wallet. Consequently, fire and emergency service providers are left with the difficult decision to either operate with older equipment or deplete their entire budget to obtain these overly priced items.

Alternatively, districts with newer apparatus suggested retiring their backup engines or tankers, leaving the district with fewer apparatus to avoid OSHA violations for housing such vehicles. Rather than having additional supply to increase safety options, these districts would eliminate these resources altogether to comply. This is compounded by the need for building repairs and renovations in many fire stations. Although some districts have newer facilities, many volunteer districts would need to undergo extensive renovations or complete rebuilds to meet the requirements under the proposed standards. However, similar to gear and apparatus expenses, these districts do not have the funds or expertise to facilitate such projects.

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When considering these expenses altogether, it becomes clear why many responders opined that their district would likely shut down as a result of the proposed regulations. Even districts who admitted to having sufficient financial means agreed that the proposed regulations would negatively impact their operations. Many responders commented the need for their district to amend current mutual aid contracts with other fire service providers. The shutdown of small districts would lead to the expansion of service from the remaining full career districts, stretching these districts thin across adjoining jurisdictions. Thus, all districts, regardless of size and economic status, will face negative impacts from these proposed regulations.

While this summary is anecdotal in nature, it does reveal the deep seated concerns held by fire protection districts in Illinois. With additional time, a more analytic study could be conducted, but whether such analysis would differ in

outcome is questionable.

### SUMMARY AND CONCLUSION

While firefighter safety is paramount at all levels of the fire service, imposing inflexible and unworkable standards for a significant portion of the fire service will not achieve that goal; instead, it risks causing a loss of individuals willing to serve their communities. This could lead to an increase in the dissolution of fire departments and a decrease in overall firefighting services. In the event of disaster in rural and unprotected areas, the remaining fire services will be tasked with covering these areas. Over time, these services, once strong and financially stable, will be stretched thin trying to fill the gaps left from the dissolved volunteer districts unable to meet OSHA's extensive and stringent compliance requirements. Nevertheless, if OSHA moves forward with finalizing these proposed regulations, it is requested that it (1) at a minimum, eliminate the "IBR" approach and include the regulatory provisions in the regulation itself; and so that access to the regulations will be available from one source; (2)

provide far more enforcement flexibility to account for the burdens and expenses all the fire organizations will face. For the standards to be effective, they must also be workable and attainable on a cost-effective basis. Similar to OSHA's proposal to use simple language to accommodate all literacy levels when training fire personnel (Proposed Rule 1910.156(h)), we propose that OSHA provides simpler standards to accommodate all fire and EMS services, even those with small revenues and limited resources.

Fire and emergency service organizations are simply not amenable to a "one-size-fits-all" approach. While uniform standards are well-intended, they must be tailored to reflect the unique needs of each service and community they serve. We believe that OSHA's regulations will have adverse effects contrary to their intended goals. To ensure the prosperity and effective support of all fire and emergency services, the Illinois Association of Fire Protection Districts respectfully urges that this proposed rule not be finalized in its current form. ■



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