

Administrative Rule Analysis



GENERAL INDUSTRY SAFETY AND HEALTH STANDARD PART 74. FIREFIGHTING

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Rule Set No.: 2020-067 LE
Submitted to JCAR on: 4/20/22

Analysis available at
<http://www.legislature.mi.gov>

Department: Labor and Economic Opportunity
Agency: Michigan Occupational Safety and Health Administration
Enabling Statute: Michigan Occupational Safety and Health Act, 1974 PA 154, MCLs 408.1014r, 408.1016, and 408.1021 et seq.

Analysis Complete to: 5/11/22

BACKGROUND AND SUMMARY OF PROPOSED RULES

Rule Set 2020-067 LE would make numerous amendments, additions, and rescissions to rules regarding health and safety hazards in the workplace, with respect to firefighting. Specifically, the rule set would update adopted National Fire Protection Association standards, including requirements for live fire training; include new rules regarding use of firefighting foam concentrates containing Polyfluoroalkyl Substances, pursuant to MCL 408.1014r; and revise existing rules and rescind outdated rules.

FISCAL IMPACT OF PROPOSED RULES

2020-067 LE is anticipated to have a negligible fiscal impact on the Department of Labor and Economic Opportunity, with projected costs totaling less than \$2,000 for printing and distribution of rules, purchasing of standards, and in-house staff training. The Michigan Occupational Safety and Health Administration surveyed stakeholders (advisory committee members and contacts provided by the State of Michigan Fire Marshal) regarding anticipated compliance costs. Survey responses were classified by fire department size, with "small" departments defined as having an annual operating budget of \$10,000 to \$500,000; "medium" as \$500,001 to \$3,000,000; "large" as \$3,000,001 to \$8,000,000; and "very large" as \$8,000,001 and greater. Given uneven survey response rates and the topography of the state's fire service landscape, actual compliance costs will likely differ from the survey averages. The table below provides average projected compliance costs derived from survey responses.

Fire Department Size	Average Estimated Cost
Small	\$302,700
Medium	\$961,600
Large	\$258,300
Very Large	\$1,560,200

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