

October 25, 2006

Mr. Jeffrey J. Morrisette
State Fire Administrator
Connecticut Fire Academy
34 Perimeter Road
Windsor Locks, CT 06096-1069

Dear Mr. Morrisette:

As you are aware, former Commissioner of Labor Shaun B. Cashman had an opportunity to review the laws concerning minors in the workplace and their effect on the performance of activities which generally comprise junior firefighting programs. Commissioner Cashman issued a letter dated November 18, 2004 that included guidance with respect to the performance of such activities. Over the past year, a work group comprised of members of the Commission on Fire Prevention and Control and the Connecticut Fire Chiefs' Association met with representatives from this Agency and have agreed upon certain modifications to that previous guidance.

Guidelines for Cadets/Explorers/Junior Firefighters

The following activities for all firefighter trainees (cadets/explorers/junior firefighters, etc.) under the age of eighteen (18) years are prohibited:

1. Driving any department vehicles in emergency mode.
2. Perform interior fire suppression involving structures, vehicle, or wildland fires, except grass fires.
3. Operate a personal vehicle with blue lights
4. Perform firefighting overhaul duties;
5. Respond to hazardous materials fires, spills or other events which may expose the minor to a toxic and/or hazardous material exceeding a threshold limit value listed in the tables of section 1910.1000 of subpart Z of 29 CFR 1910. (allows for small motor vehicle fuel leaks)
6. Perform any activity, except training performed by qualified personnel (after medical certification as required by 29 CFR 1910.134), involving the use of self-contained breathing apparatus:
7. Enter a confined space as defined in 29 CFR 1910.146;
8. Perform "off shore" ice rescue activities

9. Perform any duty, which involves the risk of falling a distance of 6 feet or more (including the use of ladders);
10. Filling air bottles;
11. Using cutting torches;
12. Operating aerial ladders;
13. Performing any duties involving the use of lines greater than 2 ½", except 5-6" suction lines during drafting operations.

The following activities may be performed by minors 16 and 17 year-old:

1. Attend and take part in supervised training;
2. Wear personal protective equipment that readily identifies them as a "minor firefighter;"
3. May respond to emergencies on fire department apparatus after receiving proper training;
4. Participate in functions within the rehabilitation sector;
5. Pick up hose and clean up at the fire scene after the incident commander has declared the area as safe;
6. Fight grass fires, after receiving proper training;
7. Perform search and rescue operations, not including structural fire fighting;
8. Use pneumatic/power driven saws, shears, Hurst-type tools, or other power tools during training evolutions only;
9. Enter the interior of a fire structure after the fire is extinguished and the structure has been declared safe by the Incident Commander;
10. Set up uncharged attack lines exterior to the structure;
11. Change SCBA bottles at emergency scenes.
12. Perform traffic control duties after receiving proper training;
13. Operate pumps, less than 300 gpm, at an emergency scene;
14. Handle charged hoselines up to 1 ¾" diameter;
15. Drive department vehicles, not greater than 10,000 pounds GVWR, in a non-emergency mode, after receiving proper training.

The above duties may be performed between the hours of 6 A.M. and 12 A.M.

14 and 15 year-olds may only perform the following:

1. Attend meetings that conclude no later than 10 P.M. throughout the year; Respond to incidents no later than 7 P.M. and may remain on-scene no later than 10 P.M.;
2. Wear personal protective equipment that readily identifies them as "minor firefighters;"
3. Receive instruction and engage in training that does not involve fire, smoke (except theatrical/latex smoke), toxic or noxious gas, or hazardous materials or substances;
4. May respond to emergencies on fire department apparatus after receiving proper training after the age of fifteen;

5. Observe exterior firefighting activities, while under supervision;
6. Clean-up service at the scene of the fire, but only outside of the structure and only after the scene has been declared safe by the incident commander;
7. Participate in functions within the rehabilitation sector.

The above duties may be performed between the hours of 7 A.M. and 10 P.M.

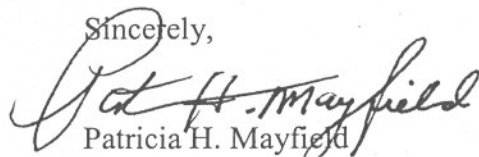
The following paragraph is a joint statement from the members of the work group:

The above guidelines have been jointly created by representatives of the Department of Labor, the Commission on Fire Prevention and Control and the Connecticut Fire Chiefs' Association. They have been developed to provide guidance to fire departments in the operation of "cadet" firefighter programs. It is the intent of these programs to provide a safe, yet meaningful experience for the youth of our communities. These programs are to be viewed as an instructional and educational activity. Cadet programs are not intended to replace fire personnel, but rather to expose our youth to the occupation of firefighting. These guidelines are to be considered the maximum parameters for operation. Fire departments are free to restrict the participation of cadets within these guidelines. Safety of the cadets is the highest priority at all times. These guidelines will be reviewed as necessary.

In addition, as Commissioner of Labor, I want to emphasize the following points:

- (1) The Department of Labor maintains that adherence to these guidelines is critical to insuring that the junior firefighting programs are not operated in a manner which violates Connecticut statutes governing employment of minors. (Section 31-23 *et seq.* of the Connecticut General Statutes)
- (2) However, the Department's recognition of these guidelines should in no way be construed as insulating any fire department from liability under any other state or federal law.
- (3) Further, the Department's recognition of these guidelines does not in any way diminish the authority of the Connecticut Occupational Safety and Health Administration (CONN-OSHA) to enforce health and safety laws within its jurisdiction as they relate to junior firefighters and fire departments pursuant to Section 31-374 *et seq.* of the Connecticut General Statutes.

Sincerely,


Patricia H. Mayfield
Commissioner