1. Revise D.2.2 to read as follows:

D.2.2 Flame-resistant fabrics also are used. Compliance with this standard does not make a fabric suitable for work clothing in industries where exposure to heat, open flames, arc flash or flash fire is a possibility. See NFPA 1971, NFPA 1975, NFPA 1977, NFPA 2112, ASTM F1506, Standard Performance Specification for Flame Resistant and Electric Arc Rated Protective Clothing Worn by Workers Exposed to Flames and Electric Arcs, or ASTM F1891, Standard Specification for Arc and Flame Resistant Rainwear, for such applications.

2. Revise E.1.1 to read as follows:

E.1.1 NFPA Publications. National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02169-7471.

   NFPA 2112, Standard on Flame-Resistant Clothing for Protection of Industrial Personnel Against Short-Duration Thermal Exposures from Fire, 2018 edition.

3. Revise E.1.2.1 to read as follows:

E.1.2.1 ASTM Publications. ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

Substantiation: Please accept our apologies, as we have missed the public input windows for revision of this new edition of the standard. We feel that our comments are pertinent to submit as a TIA as they may affect the safety of workers who may purchase clothing labeled as flame-resistant by virtue of having complied with NFPA 701 and use it, inappropriately as personal protective equipment/work clothing. It is that danger that provides the emergency nature for this TIA and requires prompt action by the committee. While this inappropriate use of the standard is clearly unintended, the wording of Section D.2.2 as it stands implies that this standard may be appropriate for the evaluation of work clothing for use as PPE (personal protective equipment), which is certainly not the case. As a third-party testing laboratory and consulting company, we have been asked (many times) by manufacturers if they can use this standard for compliance with the requirements of PPE. Unfortunately, we’ve also seen instances where manufacturers use this document as a loophole to label clothing with poor fire performance as “flame-resistant” and use it for inappropriate applications like protection against arc flash and flash fire (in such scenarios, inappropriate melting fabrics would melt and drip onto a worker’s skin potentially causing serious injury). The TIA proposes to revise this section for clarification so that NFPA 701 cannot be misinterpreted; the NFPA 701 test method is not appropriate for protective work clothing worn by workers to protect against hazards like arc flash or flash fire.

Note also that the term “flame resistant fabric” is not included in the body of the NFPA 701 test method standard (it was eliminated recently) and Section D.2.2 as worded presently gives the impression that fabrics meeting NFPA 701 are allowed by the standard to be labeled “flame resistant” when the test method does not say so.

Other standards and specifications exist and are appropriate for such uses and if work clothing is to be cited, it is reasonable to direct readers to standards appropriate for those hazards. There is precedence for this in existing standards (for example, Section 1.3.2 of NFPA 2112).

The presence of the statement in Section D.2.2 as is, without amendment is misleading and suggests to manufacturers that they can sell clothing with inappropriate fire performance for use as PPE and label it as “flame-resistant” according to this standard. The testing required by NFPA 701 is not stringent enough to determine appropriateness for hazards like flash fire and arc flash; specifications and standards for these hazards already exist and they should be referenced in this document for use.

Emergency Nature: The proposed TIA intends to correct a previously unknown existing hazard. The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation.

The presence of this statement without further detail is leading manufacturers to believe they can sell melting clothing and label it as “flame-resistant” to this standard. When used as a standalone, the testing required by NFPA 701 is not stringent enough to determine appropriateness for hazards like flash fire and arc flash; specifications and standards for these hazards already exist and they should be referenced in this document for use.

Anyone may submit a comment by the closing date indicated above. Please identify the TIA number and forward to the Secretary, Standards Council. SUBMIT A COMMENT