



SOUTH CAROLINA STATE FIREFIGHTERS' ASSOCIATION

January 29, 2025

To the Most Honorable Senators

Lindsey Graham
211 Russell Senate Office Building
Washington, DC 20510

Tim Scott
104 Hart Senate Office Building
Washington, DC 20510

Greetings and best wishes to you both from your avid supporters in the South Carolina Fire Service.

It is with this note that we wish to offer feedback from the 17,453 members of the South Carolina Fire Service of the timely nature of our grave concerns as to the confirmation hearing for former Rep. Lori Chavez-DeRemer for the Secretary of Labor. Though possibly not directly responsible for participating in the formal hearing of the nominee, it is our hopes that through this letter, we offer written perspective that, should you be given opportunity; you will be armed with potential damaging fallout from a proposed Code of Federal Regulations (CFR) change being proposed by the Department of Labor and of which the nominee will be responsible.

We offer for your information, follow up to the discussions our leadership team has had with your office over the past year, about the developments in updating 29CFR 1910.156 – The Proposed Firefighter OSHA regulation. The proposed regulation is severely impactful to South Carolina and will only be able to be implemented in full to an estimated 25% of the state's fire departments. The remaining departments will be faced with existential decisions of complying or closing. The economic and technical feasibility of the proposed regulation, though in content a great principle, in practice cannot be achieved by the vast majority of the nation's fire service. The OSHA adoption process and hearings to date have revealed such and testimonies, of which our Association participated; are a matter of public record. We provide as an attachment to this letter, our written comments.

In short, the proposed regulation was drafted with major metropolitan areas in mind and endangers the operation of most South Carolina fire departments. Whether Berkely County or Pickens County is in the spotlight for application of the regulation, the economic impact cannot readily be absorbed and the technical implementation requiring major workforce increases cannot be achieved by primarily volunteer systems.

As the SC State Firefighters' Association seeks to protect all our citizens and delivery systems of fire protection; we humbly ask that your office may wish to inquire:

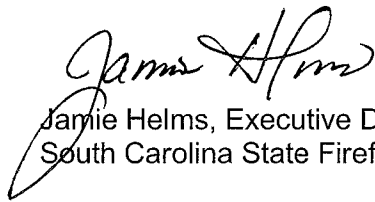
- 1) Is the nominee aware of the proposed 29 CFR 1910.156 regulation and its true impact to South Carolina, and truly the entire nations' fire service?
- 2) Is the nominee aware that no input was sought on the (stated by OSHA) 17 year development process for this regulation and therefore no input on impact was garnered by South Carolina or any mostly rural state?
- 3) Would the nominee have any intent or plans to revisit the proposed regulation and offer an opportunity for further revision and implementation hearings before the disastrous impacts of the regulation are felt by South Carolinians?

Again, most humbly, this may help us all glean the intent and direction for the viability of fire protection in our state. We stand ready to serve your office in any capacity needed and our plans are to be with you in Washington for office visits on this and other matters in two weeks.

Your servants,



Randy Arant, President
South Carolina State Firefighters' Association



Jamie Helms, Executive Director
South Carolina State Firefighters' Association