

PLC-ARMOUR-P2738-003-LTR-0

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Aug 21, 2025

Ms. Charlene Watt
Municipal Clerk, Dipl.M.M.
Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario
POA 1C0

Dear Ms. Watt:

Subject: Firefighter Training Program – Response to Fire & Risk Alliance Comments

Ontario Regulation 343/22, enacted under the *Fire Protection and Prevention Act, 1997*, establishes the mandatory certification requirements for firefighters in Ontario. This regulation requires compliance with the job performance requirements (JPRs) outlined in NFPA 1001 (*Standard for Fire Fighter Professional Qualifications*), NFPA 1072 (*Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications*), and NFPA 1041 (*Standard for Fire and Emergency Services Instructor Professional Qualifications*).

The training material developed by Fire & Risk Alliance presents an operationally relevant program for emergency response to Battery Energy Storage System (BESS) incidents. However, as currently presented, it does not satisfy the definition of a formal lesson plan as required by NFPA 1041, and Section 7 of the Firefighter Guidance Note – 7-3.

To meet these requirements, the training program must be formalized into a structured instructional package. This includes clearly defined learning objectives, instructional methods, assessment tools, instructor resources, and documentation protocols. The following elements must be incorporated:

Required Components for NFPA 1041-Compliant Training Plans:

1. Learning Objectives

- Define specific, measurable outcomes (e.g., “Identify and explain critical hazards associated with lithium-ion battery thermal runaway”).

2. Instructional Methods

- Clearly describe the delivery format (e.g., classroom instruction, practical demonstrations, virtual modules, scenario-based exercises).

3. Evaluation Tools

- Include written assessments, practical skill evaluations, and feedback mechanisms to assess participant comprehension and performance.

4. Instructor Materials & References

- Provide instructor guides and reference materials aligned with applicable codes and standards, including:
 - NFPA 855, NFPA 68, NFPA 69
 - UL 9540A
 - Safety data sheets (e.g., FR3 fluid, R-410A)
 - Manufacturer system documentation

5. Technology and Visual Aids

- Identify and describe instructional tools such as slide presentations, video simulations, virtual models, or hands-on training props.

Additional Information to Include in a Section 7 of the Firefighter Guidance Note – 7-3 Compliant Training Program:

1. Comprehensive Course Introduction

List key information:

- a. Course titles and descriptions
- b. Purpose and expected outcomes
- c. Hazards or operational tasks addressed
- d. Regulatory references (e.g., NFPA 1001, 1041, OSHA clause 25(2)(a))

2. Detailed Lesson Plans

For each course, provide:

- a. Learning objectives
- b. Teaching strategies
- c. Materials and resources
- d. Instructor qualifications
- e. Training duration and frequency
- f. Assessment methods

3. Target Audience Mapping

Identify:

- a. Job roles requiring specific training – Fire Chief, Safety Officer, Captain, etc.
- b. Prerequisite competencies
- c. Requirements for new versus experienced personnel

4. Training Schedule and Delivery

Include:

- a. Course delivery calendar
- b. Delivery modes (in-person, online, blended)
- c. Training venues (e.g., fire stations, command centers, remote sites)

5. Refresher Training Intervals

Define retraining intervals based on:

- a. Legal requirements - Section 7 of the Firefighter Guidance Note – 7-3,
- b. Operational or technological changes to BESS
- c. Future risk reassessment outcomes

6. Limits on Untrained Personnel

Outline procedures for:

- a. Identifying untrained individuals
- b. Restricting access to hazardous tasks

- c. Enforcing corrective action
- 7. Training Records Management**
Establish systems for:
 - a. Complete and timely documentation
 - b. Secure electronic backups for municipality
- 8. Program Review and Improvement**
Define a framework for:
 - a. Reviewing and updating training programs
 - b. Incorporating lessons learned
 - c. Responding to regulation or standard changes
- 9. Health and Safety Committee Involvement**
Describe the role of Joint Health and Safety Committees (JHSCs) or Health and Safety Representatives (HSRs) in:
 - o Reviewing training sufficiency
 - o Auditing course delivery and outcomes
 - o Recommending additional training as hazards emerge

Conclusion:

While the Fire & Risk Alliance training content is a good starting point, formalization into a structured lesson plan is essential to meet the requirements of Ontario Regulation 343/22 and NFPA 1041. A compliant training program must incorporate documented objectives, standardized delivery methods, robust evaluation, and regulatory alignment. These enhancements will ensure legal compliance, and firefighter safety when responding to BESS incidents.

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