## AGENDA

**Standards Council Meeting**  
Via Teams Video Conferencing  
April 14-15, 2021

<table>
<thead>
<tr>
<th>Number</th>
<th>Item</th>
<th>Description</th>
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<tr>
<td>21-4-1</td>
<td>21-4-1</td>
<td>Report of the Committee Membership Task Group (J. Quiter, Chair). No Attachment</td>
</tr>
<tr>
<td>21-4-1-a</td>
<td>21-4-1</td>
<td>Consideration of Non-Reappointments. No Attachment</td>
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<td>21-4-1-b</td>
<td>21-4-1</td>
<td>Act on pending applications for Committee Members. No Attachment</td>
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<td>21-4-1-c</td>
<td>21-4-1</td>
<td>Request for classification reconsideration. No Attachment</td>
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<td>21-4-1-d</td>
<td>21-4-1</td>
<td>Report back to Council in accordance with Decision No. 20-6 (20-12-21). No Attachment</td>
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<td>21-4-2</td>
<td>21-4-2</td>
<td>Report of the Awards Task Group (J. Golinveaux, Chair). No Attachment</td>
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<td>21-4-3</td>
<td>21-4-3</td>
<td>Update from P&amp;P Chair. No Attachment</td>
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<td>21-4-4</td>
<td>21-4-4</td>
<td>Report of the December 2020 Minutes. No Attachment</td>
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<tr>
<td>21-4-5</td>
<td>21-4-5</td>
<td>Review of the process of Standards Council decision making by Suzanne Gallagher, Deputy General Counsel. No attachment.</td>
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### TENTATIVE INTERIM AMENDMENTS (TIAs)

<table>
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<tr>
<th>Number</th>
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<tbody>
<tr>
<td>21-4-6</td>
<td>21-4-6</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 10.5.1.6.2 and add new associated Annex material of the 2020 edition of NFPA 2, <em>Hydrogen Technologies Code</em> (TIA No. 1542).</td>
</tr>
<tr>
<td>21-4-6-a</td>
<td>21-4-6</td>
<td>Text of proposed TIA No. 1542. See Attachment 21-4-6-a</td>
</tr>
<tr>
<td>21-4-6-b</td>
<td>21-4-6</td>
<td>Ballot results of TIA No. 1542. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 29 voting members/26 agree on technical merit/0 disagree/0 abstained/3 ballots not returned/26 agree on emergency nature/0 disagree/0 abstained/3 ballots not returned. See Attachment 21-4-6-b</td>
</tr>
<tr>
<td>21-4-6-c</td>
<td>21-4-6</td>
<td>No comments were received.</td>
</tr>
<tr>
<td>21-4-7</td>
<td>21-4-7</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Annex A.7.2.2item (5) of the proposed 2022 edition of NFPA 10, <em>Standard for Portable Fire Extinguishers</em> (TIA No. 1557).</td>
</tr>
<tr>
<td>21-4-7-a</td>
<td>21-4-7</td>
<td>Text of proposed TIA No. 1557. See Attachment 21-4-7-a</td>
</tr>
<tr>
<td>21-4-7-b</td>
<td>21-4-7</td>
<td>Ballot results of TIA No. 1557. <strong>FAILED</strong> ballot - passed ballot on technical merit but failed ballot on emergency nature – 31 voting members/22 agree on technical merit/6 disagree/0 abstained/3 ballots not returned/19 agree on emergency nature/9 disagree/0 abstained/3 ballots not returned. See Attachment 21-4-7-b</td>
</tr>
<tr>
<td>21-4-7-c</td>
<td>21-4-7</td>
<td>One comment was received. See Attachment 21-4-7-c</td>
</tr>
<tr>
<td>21-4-8</td>
<td>21-4-8</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 4.7.1.6 of the 2018 edition of NFPA 12, <em>Standard on Carbon Dioxide Extinguishing Systems</em> (TIA No. 1543).</td>
</tr>
<tr>
<td>21-4-8-a</td>
<td>21-4-8</td>
<td>Text of proposed TIA No. 1543. See Attachment 21-4-8-a</td>
</tr>
<tr>
<td>21-4-8-b</td>
<td>Ballot results of TIA No. 1543. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 34 voting members/26 agree on technical merit/0 disagree/1 abstained/7 ballots not returned/26 agree on emergency nature/0 disagree/1 abstained/7 ballots not returned. See Attachment 21-4-8-b</td>
<td></td>
</tr>
<tr>
<td>21-4-8-c</td>
<td>No comments were received.</td>
<td></td>
</tr>
<tr>
<td>21-4-9</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 20.5.3.1.3 of the proposed 2022 edition of NFPA 13, <em>Standard for the Installation of Sprinkler Systems</em> (TIA No. 1560).</td>
<td></td>
</tr>
<tr>
<td>21-4-9-a</td>
<td>Text of proposed TIA No. 1560. See Attachment 21-4-9-a</td>
<td></td>
</tr>
<tr>
<td>21-4-9-b</td>
<td>Ballot results of TIA No. 1560. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 36 voting members/22 agree on technical merit/12 disagree/0 abstained/2 ballots not returned/18 agree on emergency nature/16 disagree/0 abstained/2 ballots not returned. <strong>PASSED</strong> CC ballot on correlation but <strong>FAILED</strong> ballot on emergency nature – 22 voting members/19 agree on correlation/0 disagree/1 abstained/1 ballots not returned/7 agree on emergency nature/14 disagree/0 abstained/1 ballots not returned. See Attachment 21-4-9-b</td>
<td></td>
</tr>
<tr>
<td>21-4-9-c</td>
<td>No comments were received.</td>
<td></td>
</tr>
<tr>
<td>21-4-10</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new Annex material A.14.3.2 to the 2019 edition of NFPA 72, <em>Fire Alarm Signaling Code</em> (TIA No. 1548).</td>
<td></td>
</tr>
<tr>
<td>21-4-10-a</td>
<td>Text of proposed TIA No. 1548. See Attachment 21-4-10-a</td>
<td></td>
</tr>
<tr>
<td>21-4-10-b</td>
<td>Ballot results of TIA No. 1548. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 28 voting members/16 agree on technical merit/8 disagree/1 abstained/3 ballots not returned/16 agree on emergency nature/8 disagree/1 abstained/3 ballots not returned. <strong>PASSED</strong> CC ballot on both correlation and emergency nature – 19 voting members/17 agree on correlation/0 disagree/1 abstained/1 ballots not returned/14 agree on emergency nature/3 disagree/1 abstained/1 ballots not returned. <strong>REBALLOT FINAL RESULTS</strong> of TIA No. 1548. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 28 voting members/16 agree on technical merit/5 disagree/0 abstained/7 ballots not returned/16 agree on emergency nature/5 disagree/0 abstained/7 ballots not returned. See Attachment 21-4-10-b</td>
<td></td>
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<tr>
<td>21-4-10-c</td>
<td>Four comments were received. See Attachment 21-4-10-c</td>
<td></td>
</tr>
<tr>
<td>21-4-11</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new section 26.2.10 to the 2019 edition and proposed 2022 editions of NFPA 72, <em>Fire Alarm Signaling Code</em> (TIA No. 1549).</td>
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<tr>
<td>21-4-11-a</td>
<td>Text of proposed TIA No. 1549. See Attachment 21-4-11-a</td>
<td></td>
</tr>
<tr>
<td>21-4-11-b</td>
<td>Ballot results of TIA No. 1549. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 26 voting members/24 agree on technical merit/0 disagree/0 abstained/2 ballots not returned/24 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned. <strong>PASSED CC</strong> ballot on both correlation and emergency nature – 19 voting members/17 agree on correlation/0 disagree/0 abstained/2 ballots not returned/17 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned. See Attachment 21-4-11-b</td>
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<tr>
<td>21-4-11-c</td>
<td>Two comments were received. See Attachment 21-4-11-c</td>
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<tr>
<td>21-4-12</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Annex A.5.11 Example 4 of the 2021 edition of NFPA 92, <em>Standard for Smoke Control Systems</em> (TIA No. 1547).</td>
<td></td>
</tr>
<tr>
<td>21-4-12-a</td>
<td>Text of proposed TIA No. 1547. See Attachment 21-4-12-a</td>
<td></td>
</tr>
<tr>
<td>21-4-12-b</td>
<td>Ballot results of TIA No. 1547. PASSED ballot on both technical merit and emergency nature – 31 voting members/25 agree on technical merit/0 disagree/2 abstained/4 ballots not returned/26 agree on emergency nature/0 disagree/1 abstained/4 ballots not returned. See Attachment 21-4-12-b</td>
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</tr>
<tr>
<td>21-4-12-c</td>
<td>No comments were received.</td>
<td></td>
</tr>
<tr>
<td>21-4-13</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new item (13) to section 6.1.3 and revise Section 6.1.4 of the 2021 edition of NFPA 99, <em>Health Care Facilities Code</em> (TIA No. 1522).</td>
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<tr>
<td>21-4-13-a</td>
<td>Text of proposed TIA No. 1522. See Attachment 21-4-13-a</td>
<td></td>
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<tr>
<td>21-4-13-b</td>
<td>Ballot results of TIA No. 1522. PASSED ballot on both technical merit and emergency nature – 33 members/25 agree on technical merit/2 disagree/0 abstained/6 ballots not returned/24 agree on emergency nature/3 disagree/0 abstained/6 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 18 voting members/14 agree on correlation/0 disagree/0 abstained/4 ballots not returned/14 agree on emergency nature/0 disagree/0 abstained/4 ballots not returned. See Attachment 21-4-13-b</td>
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<tr>
<td>21-4-13-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-14-a</td>
<td>Text of proposed TIA No. 1559. See Attachment 21-4-14-a</td>
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<tr>
<td>21-4-14-b</td>
<td>Ballot results of TIA No. 1559. PASSED ballot on both technical merit and emergency nature – 25 voting members/21 agree on technical merit/2 disagree/0 abstained/2 ballots not returned/22 agree on emergency nature/1 disagree/0 abstained/2 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 12 voting members/10 agree on correlation/0 disagree/0 abstained/2 ballots not returned/10 agree on emergency nature/0 disagree/0 abstained/2 ballots not returned. See Attachment 21-4-14-b</td>
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<tr>
<td>21-4-14-c</td>
<td>One comment was received. See Attachment 21-4-14-c</td>
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<tr>
<td>21-4-15</td>
<td>Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise Sections 5.1.12, 6.1.3.12.2.7, 6.1.3.12.2.8, 6.1.3.12.2.9 and Table C.1 of the 2017 edition and proposed 2022 editions of NFPA 407, <em>Standard for Aircraft Fuel Servicing</em> (TIA No. 1558).</td>
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</tr>
<tr>
<td>21-4-15-a</td>
<td>Text of proposed TIA No. 1558. See Attachment 21-4-15-a</td>
<td></td>
</tr>
<tr>
<td>21-4-15-b</td>
<td>Ballot results of TIA No. 1558. <strong>FAILED</strong> ballot on both technical merit and emergency nature – 29 voting members/15 agree on technical merit/10 disagree/0 abstained/4 ballots not returned/15 agree on emergency nature/10 disagree/0 abstained/4 ballots not returned. See Attachment 21-4-15-b</td>
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<tr>
<td>21-4-15-c</td>
<td>One hundred sixty (160) comments were received. One hundred fifty-eight (158) comments support the TIA, two (2) comments do not support the TIA. See Attachment 21-4-15-c</td>
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</tr>
<tr>
<td>21-4-15-d</td>
<td><strong>APPEAL</strong> Consider the appeal of Steve Berry, National Air Transportation Assoc., to overturn the ballot results of TIA No. 1558 and issue the TIA. See Attachment 21-4-15-d</td>
<td></td>
</tr>
<tr>
<td>21-4-16</td>
<td><strong>NFPA 499</strong> Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise section 3.3.3, and associated Annex material of the 2021 edition of NFPA 499, <em>Recommended Practice for the Classification of Combustible Dusts and of Hazardous (Classified) Locations for Electrical Installations in Chemical Process Areas</em>, (TIA No. 1546).</td>
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<tr>
<td>21-4-16-a</td>
<td>Text of proposed TIA No. 1546. See Attachment 21-4-16-a</td>
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<tr>
<td>21-4-16-b</td>
<td>Ballot results of TIA No. 1546. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 20 voting members/15 agree on technical merit/0 disagree/1 abstained/4 ballots not returned/16 agree on emergency nature/0 disagree/0 abstained/4 ballots not returned. See Attachment 21-4-16-b</td>
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<tr>
<td>21-4-16-c</td>
<td>No comments were received.</td>
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<tr>
<td>21-4-17</td>
<td><strong>NFPA 909</strong> Act on the issuance of proposed Tentative Interim Amendment (TIA) to add new references to sections 2.2, 2.3.1, 2.4, revise section 11.2.5 and add a new section 11.2.6 to the 2021 edition of NFPA 909, <em>Code for the Protection of Cultural Resource Properties – Museums, Libraries, and Places of Worship</em>, (TIA No. 1544).</td>
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<tr>
<td>21-4-17-a</td>
<td>Text of proposed TIA No. 1544. See Attachment 21-4-17-a</td>
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<tr>
<td>21-4-17-b</td>
<td>Ballot results of TIA No. 1544. <strong>PASSED</strong> ballot on both technical merit and emergency nature – 30 voting members/22 agree on technical merit/4 disagree/0 abstained/4 ballots not returned/20 agree on emergency nature/5 disagree/1 abstained/4 ballots not returned. See Attachment 21-4-17-b</td>
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</tr>
<tr>
<td>21-4-17-c</td>
<td>No comments were received.</td>
<td></td>
</tr>
<tr>
<td>21-4-18-a</td>
<td>Text of proposed TIA No. 1552. See Attachment 21-4-18-a</td>
<td></td>
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<tr>
<td>21-4-18-b</td>
<td>Ballot results of TIA No. 1552 <strong>FAILED</strong> ballot on both technical merit and emergency nature – 36 voting members/9 agree on technical merit/21 disagree/2 abstained/2 ballots not returned/8 agree on emergency nature/24 disagree/2 abstained/2 ballots not returned. See Attachment 21-4-18-b</td>
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<tr>
<td>21-4-18-c</td>
<td>Forty-four comments were received. See Attachment 21-4-18-c</td>
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<tr>
<td>21-4-18-d</td>
<td><strong>APPEAL</strong> Consider the appeal of Ryan McGill, IAFF Local 2068, to overturn the ballot results of TIA No. 1552 and issue the TIA. See Attachment 21-4-18-d</td>
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</tr>
</tbody>
</table>
Act on the issuance of proposed Tentative Interim Amendment (TIA) to delete and replace Figure 6.1.14.6(a) with existing figure from the 2016 edition of NFPA 1977, Standard for Protective Clothing and Equipment for Wildland Fire Fighting, (TIA No. 1562).

Text of proposed TIA No. 1562.

Ballot results of TIA No. 1562. PASSED ballot on both technical merit and emergency nature – 23 voting members/17 agree on technical merit/0 disagree/0 abstained/6 ballots not returned/17 agree on emergency nature/0 disagree/0 abstained/6 ballots not returned. PASSED CC ballot on both correlation and emergency nature – 27 voting members/20 agree on correlation/0 disagree/0 abstained/7 ballots not returned/20 agree on emergency nature/0 disagree/0 abstained/7 ballots not returned.

No comments were received.

Act on the issuance of proposed Tentative Interim Amendment (TIA) to revise sections 8.2.5.5, 8.2.5.7, 8.2.5.8, 8.23.5.4 through 8.23.5.6 and 8.23.5.7(new) of the 2017 edition of NFPA 1986, Standard on Respiratory Protection equipment for Tactical and Technical Operations, (TIA No. 1545).

Text of proposed TIA No. 1545.

Ballot results of TIA No. 1545. PASSED ballot on both technical merit and emergency nature – 24 voting members/17 agree on technical merit/2 disagree/2 abstained/3 ballots not returned/17 agree on emergency nature/2 disagree/2 abstained/3 ballots not returned. PASSED CC ballot on correlation but FAILED ballot on emergency nature – 27 voting members/17 agree on correlation/5 disagree/1 abstained/4 ballots not returned/15 agree on emergency nature/6 disagree/2 abstained/4 ballots not returned.

Nine comments were received.

Consider the request of Christopher Wagner, AmeriGas Propane, to develop a standard to address Mobile Food Establishments/Mobile Cooking Operations. Seventeen (17) comments
| **21-4-23** | Consider the request of Brian Lucas, City and County of Denver, CO, to develop a standard to address fire protection of cannabis growing and processing facilities. Eighty-one (81) comments were received. Seventy (70) comments support development of the project, six (6) comments do not support the development of the project, five (5) provided commentary and twenty-six (26) indicated Technical Committee interest. See Attachment 21-4-23 |
| **21-4-24** | Consider the request of the Technical Committee on Hazardous Waste to approve the preliminary draft of NFPA 401, *Recommended Practice for the Prevention of Fires and Uncontrolled Chemical Reactions Associated with the Handling of Hazardous Waste*. If approved, the Technical Committee also requests the Standard to be entered into its initial revision cycle, with a Public Input closing date of January 5, 2022. See Attachment 21-4-24 |
| **REPORTS BACK TO COUNCIL** | |
| **21-4-25** | At the December 2020 Council meeting, the Council reviewed the request of Megan Hayes on behalf of NEMA regarding the terms of listed versus certified. After review of all information before it, the issue was directed to staff for review and instructions to report back to the Council during the April 2021 meeting. No Attachment |
| **21-4-26** | In accordance with prior actions and direction of Council, the following standards have completed their current revision cycles and are therefore transferred to the Technical Committee on Emergency Responders Occupational Health: NFPA 1581, *Standard on Fire Department Infection Control Program* NFPA 1582, *Standard on Comprehensive Occupational Medical Program for Fire Departments* NFPA 1583 *Standard on Health-Related Fitness Programs for Fire Department Members* NFPA 1584, *Standard on the Rehabilitation process for Members During Emergency Operations and Training Exercises* Draft development of NFPA 1585, *Standard on Contamination Control*, continues by the Technical Committee on Emergency Responders Occupational Health and will be presented to Council for entry into its initial public revision cycle at a later date. No Attachment |
| **21-4-27** | Review and consider the request to remove NFPA 1081 from new consolidated document NFPA 1010. See Attachment 21-4-27 |
| **GENERAL ITEMS** | |
| **21-4-28** | Consider the location/method and dates for the upcoming Council meetings in 2021: August 24-26, 2021 Location/Method TBD December 7-8, 2021 Location/Method TBD |
| **21-4-29** | Update from the Council Secretary. No Attachment |
To: NFPA Standards Council

From: Kevin Carr, Staff Liaison, on behalf of the Technical Committee on Helicopter Facilities

Subject: NFPA 418, Request to Change Document Cycle

To the NFPA Standards Council,

The Technical Committee on Helicopter Facilities (HHH-AAA), responsible for NFPA 418, would like to move the next edition from the Fall 2025 cycle (2026 edition) to the Fall 2023 cycle (2024 edition). This request is for a one time move (meaning the revision cycle is intended to remain a 5 year cycle for future editions).

Two articles showcasing some of the fast-moving technology advances in areas that use/potentially use NFPA 418 (links to articles are provided below). Given these dynamics, a few of the reasons for this proposed change are:

- In the 2021 edition, the technical committee has created a new chapter (Chapter 11, Vertiports and Vertistops). These new arrangements encompass new technologies that are progressing rapidly within the marketplace as well as building arrangements. The current chapter is mostly a framework of reserved sections, with a detailed Annex explaining the intent of this new chapter. The technical committee is looking to continue work on this chapter so as to provide more detailed requirements on an enhanced timeframe.

- The current status of foam fire-extinguishing systems, and military specification foam, will need to be reassessed with the incorporation of NFPA 16 to NFPA 11 in a quicker timeframe than five years.

- The topic of use of rooftop heliport foam fire extinguishers was presented to the TC member/TC chair after the Second Draft meeting that the technical committee will need to review and provide any recommendations.

- Interconnection with other NFPA aircraft documents (NFPA 407, 409, 415) will need to be reassessed based on new changes to these documents.

Thank you for your consideration. Please let me know if I may provide any further details.

Sincerely,

Kevin Carr, CDSM, CEM, LEED AP
Senior Fire Protection Specialist
Staff Liaison, NFPA 241


To NFPA Standards Council:

The Technical Committee on LP-Gases would like to support the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments. The members of the committee have seen a rise in the number of mobile food establishments and believe that a comprehensive standard covering the design, installation, operation, inspection, and maintenance of the cooking equipment, systems and mobile unit is needed. The committee is also currently working on revising NFPA 58 LP-Gas Code to include a new chapter on the design, installation, inspection, and maintenance of LP-Gas systems on these mobile food establishment including requirements on piping, appliances, and containers.

Respectfully Submitted

[Signature]

Eric Smith
Chair for the
Technical Committee
on LP-Gases

CC:
Alex Ing
Staff Liaison for the
Technical Committee
on LP-Gases
Good idea.
Much needed.
Please proceed.

All the best,

Alex Spataru
CEO

The Adept Group, Inc.
LA, CA 90024
Good morning,

I am highly in favor of the creation of a standalone NFPA code for the establishment of a minimum construction standard for Food Producing Vehicles that are considered necessary to provide protection from loss of life, illness, or injury, from fire, explosion or exposure. I recommend this project take the place of any and all existing taskforces currently working separately and independently for the development or update of information for NFPA 1, 54, 58, 96, and any other code source in development of “Food Truck” expectations / requirements.

As all food trucks have inherent differences from typical vapor distributions systems, trying to fit the food producing vehicle standard into NFPA 58 and 54 does not make sense. Nor, based on all the nuances present within a food producing vehicle does it make sense to split the requirements between multiple code standards. Similarly to the methodology that went into NFPA 1192, an all-encompassing standalone construction standard is warranted to address all expectations, inclusive of propane, cooking equipment, ventilation, power generation, wiring, piping, fire protection, storage, refrigeration, climate control, access and egress, fresh water, gray water, sanitation, gas leak detection, container placement, and likely countless others.

Recognizing that there are already several groups working in support of adding a standard to multiple separate code pamphlets, it is conceivable they are working in opposition or at least independently towards the common objective. Following a recent review of the 2018 International Fire Code requirements for Food Producing Vehicles, there are a vast number of inconsistencies that exist between this and other recognized and generally accepted good engineering practices. An effective process to eliminate potential redundancy, or code creep would be to develop a uniform taskforce consisting of members from all of the different code committees to establish one standard for food trucks, independent from the existing codes.

Using a subsection of those responsible for the 5 code standards mentioned previously and likely others, chapters could be written for each food producing vehicle construction component / system, establishing clear guidelines for critical fire, life safety and health standards and expectations.

Based on the lack of a single uniform standard for the construction of Food Producing Vehicles to date, varying and contradictory regulations have been published by local jurisdictions, as well as within the separate code sectors, as everyone scrambles to create something in the absence of any clear leader taking control. This reactionary process that has been forced on “standard creating bodies” and will continue to perpetuate until someone uniformly takes control.

Through the creation of one Technical Standards Committee focused on creating an independent construction standard for food trucks in the spirit of NFPA 1192, leveraging the knowledge of all aspects of the life, health, safety, and construction needs for food producing vehicle development and operation, a uniform expectation can be developed, communicated, and implemented.

Food Producing Vehicle market growth will become an even greater potential in a post COVID-19 world. Restaurateurs worldwide are being forced to reconsider how to deliver meals to people while social distancing. This could result in a large number of restaurant owners removing cooking equipment from their restaurants and setting up mobile kitchens, knowing that there is no value in reopening with half or one quarter occupancy in high rent areas. In my opinion we are well behind where we need to be based on the likely result of this pandemic.
Hello,

Please see below in red.

1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments? Yes, very much

2. Please state your reason(s) for supporting or opposing such standards development. These traveling restaurants have many of the same hazards as a brick and mortar restaurant with a unique challenge of being mobile. It is a good practice to provide a uniform standard for the fire service to enforce. This will also provide customer service to the food truck industry as they will know what each jurisdiction is looking for. There have been many explosions and multiple deaths due to these trucks.

3. Are you or your organization interested in applying for membership on the Technical Committee if the Standards Council initiates development activities on the proposed project? If yes, please submit an application, in addition to your comments in support of the project: Submit online application* I am interested. I am the SE Regional Director for FFMIA and will be applying as I was on a local County committee for food trucks and on the NFPA 96 task group for mobile cooking operations.

Tommy Demopoulos, CFI, CFPE, CFPS, CFEI, FO, FM
Assistant Fire Marshal | Fire Rescue Department
6000 Hiatus Road, Tamarac, FL 33321
Tel: (954) 597-3800 | Fax: (954) 597-3810
www.tamarac.org

Customers can pay for invoices online at www.tamarac.org/invoices.

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As a member of the NFPA 96 technical committee for a number of years, I am familiar with all of the discussions and work that the committee has done to address the issues related to “food trucks”. Having been involved in fire protection for nearly 40 years I have dealt with untold numbers of fire code officials who were unaware that the requirements of NFPA 96 were applicable to such operations.

Developing the requirements which were contained in NFPA 96, 2017 edition in Annex B was the first step and these were refined in the 2020 edition with the creation of Chapter 17.

My experience is that many code officials still are unaware of the “food truck” requirements in NFPA 96. Believe this is due to the large number of jurisdictions which utilize the ICodes which do not reference NFPA 96. Further, I am aware than many code officials and jurisdictions have taken the position that “fire codes”, such as NFPA 1 and the IFC do not apply to “food trucks” because they are mobile and not structures. Such positions make incorporating the “food truck” requirements in the “fire codes” an ineffective approach.

I believe there is an analogy in what is occurring throughout the country dealing with “food trucks” to what occurred back in the 1980’s with fire sprinklers. In the early 1980’s there was NFPA 13 and NFPA 13D and nothing in between. This lead to numerous jurisdictions developing their own “home grown” requirements for sprinklers in occupancies such as apartments, hotels and motels. This lead to the development of NFPA 13 R so that there was a universal, consistent standard. Going back even further, one of the reasons that NFPA was first formed was to develop a national standard for fire sprinkler standards.

Today, we have numerous jurisdictions who have or who are developing their own “home grown” requirements for “food trucks”. This leads to gross inconsistencies across the country. How can we expect a designer/manufacturer or operator of such a facility to be able to comply with requirements that can vary substantially from one jurisdiction to another?

There is clearly a justifiable need for NFPA to develop a stand-alone standard for “food trucks” that addresses not only ventilation, fire protection, cooking equipment but appropriate requirements for electrical and gas systems as well as applicable vehicle design/construction issues.

The new committee should include members of the current NFPA 96 committee along with individuals representing the design, construction and operation of “food trucks”. It would also be helpful to have a designated representatives from the NFPA 54, 58 and 70 committees.

James G. Munger, PhD, FiFireE, CFPS, BCO
Partner
Q-Dot Engineering, LLC
1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments?
   Speaking as the chair of a working group to establish requirements for LP-Gas systems in mobile food facilities under the Technical Committee on Liquefied Petroleum Gases, the working group feels that a standard pertaining to minimum fire and life safety provisions for mobile food establishments is appropriate. The committee for this standard should draw from the expertise of the many disciplines involved in the mobile system commonly known as a food truck.

2. Please state your reason(s) for supporting or opposing such standards development.
   - The current rules pertaining to mobile cooking operations, “food trucks,” is a mishmash of rules in a variety of documents.
   - NFPA 96, Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations, took a major step toward putting much of the information pertaining to fire protection, with an emphasis on ventilation, in its Annex B in 2017. This was moved into the standard in the 2021 edition. Parts of this Annex B and what is now in NFPA 96 have nothing to do with ventilation, such as vehicle-mounted generators and LP-Gas systems.
   - The scope statement of NFPA 96 does not include anything about the use of LP-Gas or the installation requirements for LP-Gas systems.
   - Some parts of the LP-Gas system requirements in NFPA 96 are taken from NFPA 58, some from NFPA 1192, and some are not identifiable as to their source. This creates confusion when the rules are not consistent of when a different type of rule is stated, e.g., “Holes in the living area shall be sealed.” [Emphasis added, as “living area” is not be a proper term for a commercial cooking location.]
   - NFPA 58, the Liquefied Petroleum Gas Code, is where requirements for LP-Gas systems are normally found.
   - Some parts of the LP-Gas system requirements in NFPA 96 do not match requirements in NFPA 58, thus creating a conflict in requirements and confusion for anyone installing the gas system in a food truck or trailer.
   - The Technical Committee on Liquefied Petroleum Gases appointed a working group to refine requirements for LP-Gas systems in mobile food facilities and work is well underway to add a new chapter pertaining to this for the next edition of NFPA 58. This working group showed an interest in establishing a separate standard for mobile food facilities, which include trucks, trailers, carts, and other mobile food-preparation facilities.

Thank you.

Richard Fredenburg

Please don’t print this unless you really need to!

Richard Fredenburg, LP-Gas Engineer
North Carolina Department of Agriculture and Consumer Services, Standards Division
Telephone 919-707-3231
Fax 919-715-0524

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.
1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments?
   Speaking as the chair of a working group to establish requirements for LP-Gas systems in mobile food facilities under the Technical Committee on Liquefied Petroleum Gases, the working group feels that a standard pertaining to minimum fire and life safety provisions for mobile food establishments is appropriate. The committee for this standard should draw from the expertise of the many disciplines involved in the mobile system commonly known as a food truck.

2. Please state your reason(s) for supporting or opposing such standards development.
   - The current rules pertaining to mobile cooking operations, “food trucks,” is a mishmash of rules in a variety of documents.
   - NFPA 96, *Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations*, took a major step toward putting much of the information pertaining to fire protection, with an emphasis on ventilation, in its Annex B in 2017. This was moved into the standard in the 2021 edition. Parts of this Annex B and what is now in NFPA 96 have nothing to do with ventilation, such as vehicle-mounted generators and LP-Gas systems.
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   - Some parts of the LP-Gas system requirements in NFPA 96 are taken from NFPA 58, some from NFPA 1192, and some are not identifiable as to their source. This creates confusion when the rules are not consistent of when a different type of rule is stated, e.g., “Holes in the *living area* shall be sealed.” [Emphasis added, as “living area” is not be a proper term for a commercial cooking location.]
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Thank you.

Richard Fredenburg

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Richard Fredenburg, LP-Gas Engineer
North Carolina Department of Agriculture and Consumer Services, Standards Division
Telephone 919-707-3231
Fax 919-715-0524

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.
Hello,

My apologies for being tardy with this response, but please do accept it as the National Propane Gas Association represents about 2500 individuals and businesses that provide equipment and services to the propane industry in the U.S. and abroad.

Regarding the consideration of opening a new project on mobile food establishments, the National Propane Gas Association has not established a formal position, but as a member of NFPA technical committees, including the Technical Committee on Liquefied Petroleum Gases, my own opinion is that opening a project to address mobile food establishments would be a worthwhile endeavor.

NFPA 96 is currently the “lead” standard on food trucks and that group has put a lot of time and effort into refining its requirements for the safe operation of those vehicles. However, the technical committee does not appear to have expertise in all of the different systems that a mobile food establishment could include. For example, the fuel gas system can be either natural gas or propane and although the requirements for piping systems are similar, they are not identical. There is even more disparity between the requirements for propane containers and those used for compressed natural gas. The members of the NFPA 96 group may not have the technical background or knowledge to encompass these different systems.

I do plan on submitting an application to become a member of this technical committee in the event that the Standards Council decides to proceed with its formation.

Thank you for your consideration.

Bruce Swiecicki, P.E.
Senior Technical Advisor
Regulatory and Technical Services
NATIONAL PROPANE GAS ASSOCIATION

815.806.9035 TEL
708-209-6288 CELL
bswiecicki@npga.org
http://www.npga.org
I am in favor of the development of a standard the minimum fire and life safety provisions for mobile food establishments. These operations are not addressed thoroughly in other guides, standards or codes to provide local code officials the tools needed to effectively regulate these operations. The reported incidents involving these mobile food establishments are usually very catastrophic in nature. Additionally, because the locations mobile food establishments are typically used involving large crowds at events the potential for a mass casualty type incident increases if these units are not properly designed, constructed, maintained and operated. A standard would also provide consistency for the industry by aligning the requirements from one jurisdiction to another rather than one having little to no requirements and the next having very stringent ones. A standard would allow vendors to operate in a regional area operating under the same or similar requirements. This would also allow for a more standardized platform regarding training that NFPA could provide for code officials and inspectors.

Thank you,

Steve

Stephen Rinaldi, EFO, FM, CFPS, CFI
Senior Fire & Life Safety Coordinator
Los Alamos Fire Department
999 Central Ave. Suite 200
Los Alamos, NM 87544
(505) 662-8314 Office
(505) 709-8454 Cell
Char-Broil, LLC is in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments.

Char-Broil is a manufacturer of outdoor cooking appliances fueled by natural gas, LP, electricity, wood pellets, charcoal, and wood. These are intended for use in residential applications or portable personal use applications. We want to see a clear line drawn to prevent our products from being used in the commercial cooking environment of mobile food establishments. So we would like to see specific listing for appliances designed for use in mobile food establishments and a mandate that all appliances in an approved mobile food establishment be so listed. We can then unequivocally communicate to our customers that our products are not so listed and are not to be so used.

Alex Gafford  
V.P., Director of Advanced Development  
Charbroil, LLC  
1555 Concord Rd - packages  
1442 Belfast Avenue - letters  
Columbus, GA, 31904, USA  
www.charbroil.com  
706.576.6356
Hello,

The City of Fort Collins would be in support of a standard for Fire and Life safety provisions for Food Trucks. With no current testing requirements for LP systems or vent hoods this standard would ensure some basic life safety provisions are met. If you need any additional information please feel free to contact me directly.

Thank you,

Rich Anderson, CBO
Chief Building Official, Building Services
City of Fort Collins
281 North College Avenue
970-416-2748 Office
970-660-7320 Cell
randerson@fcgov.com

Click Here for Find my permit interactive Map

Starting Monday, August 31, 2020, the 281 N. College Ave. building will be closed between 12:00PM – 1:00PM.

Building hours will be: Monday – Thursday, 9:00AM – 12:00PM and 1:00PM – 4:00PM.

“The City of Fort Collins is an organization that supports equity for all, leading with race. We acknowledge the role of local government in helping create systems of oppression and racism and are committed to dismantling those same systems in pursuit of racial justice. Learn more.”

COVID19 Resources
For all residents: https://www.fcgov.com/eps/coronavirus
For businesses: https://www.fcgov.com/business/
Want to help: https://www.fcgov.com/volunteer/
NFPA Standards Council:

I’d like to support the development of a new standard on mobile cooking operations. Right now, NFPA 96 seems to be the primary standard but NFPA 58 also has a large say in the safe construction and operation of commercial mobile cooking operations. There are probably other standards as well, including NFPA 70, perhaps.

I am confident that the NPGA would also commit volunteers to serve on the standards development committee. Amongst our members are some who expressed interest in doing so.

Thank you for your consideration.

Bruce Swiecicki, P.E.
Senior Technical Advisor
Regulatory and Technical Services
NATIONAL PROPANE GAS ASSOCIATION

815.806.9035 TEL
708-209-6288 CELL
bswiecicki@npga.org
http://www.npga.org
The Iowa Propane Gas Association would support the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments. Currently there are 28 food trucks, trailers, carts, and stands that call Des Moines, Iowa their home city. The city of Des Moines even has their own trade association, Legion of Food. Their motto: “Wherever there is hunger, you will find us.” The Des Moines City Council has approved a measure to allow food trucks to operate legally, allowing mobile vendors to set up shop in metered parking spaces in four designated downtown zones: Western Gateway; near the Iowa Events Center; west of the Polk County Courthouse; and the western East Village.

This is just Des Moines. There are numerous other events throughout the state, not to mention vendors at home college football games (Iowa Hawkeyes in Iowa City and Iowa State Cyclones in Ames) that mobile food establishments are present. These mobile units are popping up everywhere as they gain popularity. We also have a large number of mobile food vendors scattered throughout the Iowa State Fairgrounds every August. Where do all of these mobile cooking establishments currently go for compliance information? Where do the manufacturers of these units go for compliance information? Where do the inspectors go for compliance information?

I know there is some information currently in NFPA 1, Chapter 50 and there is also information within NFPA 96, Chapter 17 (which also requires compliance with NFPA 58 for LP-Gas Systems). If a stand alone NFPA Standard was created for mobile food establishments then only one code would need to be reviewed and followed for compliance by the mobile food establishment, the manufacturer, and the inspector (AHJ). I have been called upon by the city of Des Moines Fire Department for assistance with training and interpretation of NFPA 58 as it pertains to these applications. Many times if they encounter a vendor with questionable installations they get referred to me. I (and I think they) would appreciate a single reference source to go to.

Thank you,

Tom Dunn
February 22, 2021

Dawn Michele Bellis
Director and NFPA Standards Council Secretary
1 Batterymarch Park
Quincy, MA 02169-7471

Ms. Bellis,

I am writing as an interested individual currently representing myself in support of NFPA developing a Standard for mobile food establishments. I am also interested in applying (and have) to the Technical Committee for the project if initiated. As the popularity of mobile food vending trucks grew over the last two decades, enforcers, users, and other stakeholders are hungry for a document that will satisfy their taste for reducing risk (loss) and saving lives. Pardon the puns and I am happy to add my experience to the discussion.

This is the moment, and it needs to be seized. Much conversation has been iterated, especially after tragic events. I have been hoping NFPA would take this step by issuing a comprehensive single document addressing the features of mobile food vending trucks.

In my previous life as a program manager (Lieutenant) for technical code enforcement in the District of Columbia’s (DC) Fire Marshal’s Office, we recognized the risks posed by this activity. We built a compliance inspection process for mobile food vending trucks from scratch. Because of DC’s form of government and our size, we partnered with the DC Dept. of Health and collaborated on the safety inspections. We roughly based it on our compliance standards for temporary food vendors at our many outdoor festivals and events.

DC’s fire prevention code (International Fire Code) references many NFPA documents. We used NFPA 10 and 58 along with CO safety documents to achieve a basic threshold of compliance. None of the mobile food vending trucks had ventilation hoods or suppression that brought NFPA 96 into the conversation.

Fast forward to my position as the Fire Marshal for a large private university in Philadelphia where things are different. My role is no longer as an AHJ but as a stakeholder as we have many mobile food vending trucks on campus. Compliance/enforcement is a tangled mess between the City and the Commonwealth of Pennsylvania for these trucks, and we pay the price. In my previous and current role, I have always felt that if there was one document to point to the unique provisions of a mobile food vending truck, it would benefit all stakeholders.

I look forward to and hope to be part of this project and thank you for your consideration.

Sincerely,

[Signature]

David W. Hollinger
Director, Fire and Emergency Services
Maynard, Mary

From: Wagner, Christopher J. <Christopher.Wagner@amerigas.com>  
Sent: Thursday, February 18, 2021 4:37 PM  
To: stds_admin  
Subject: Comments on New Project on Mobile Food Establishments/Mobile Cooking Operations

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I am highly in favor of the creation of a standalone NFPA code for the establishment of a minimum construction standard for Food Producing Vehicles that are considered necessary to provide protection from loss of life, illness, or injury, from fire, explosion or exposure. I recommend this project take the place of any and all existing taskforces currently working separately and independently for the development or update of information for NFPA 1, 54, 58, 96, and any other code source in development of “Food Truck” expectations / requirements.

As all food trucks have inherent differences from typical vapor distributions systems, trying to fit the LP Gas expectations for food producing vehicle standard into NFPA 58 or 54 does not make sense. Nor, based on all the nuances present within a food producing vehicle does it make sense to split the requirements between multiple code standards. Similarly to the methodology that went into NFPA 1192, an all-encompassing standalone construction standard is warranted to address all expectations, inclusive of propane, cooking equipment, ventilation, power generation, wiring, piping, fire protection, storage, refrigeration, climate control, access and egress, fresh water, gray water, sanitation, gas leak detection, container placement, and likely countless others.

Recognizing that there are already several groups working in support of adding a standard to multiple separate code pamphlets, it is conceivable they are working in opposition or at least independently towards the common objective. Following a recent review of the 2018 International Fire Code requirements for Food Producing Vehicles, there are a vast number of inconsistencies that exist between this and other recognized and generally accepted good engineering practices. An effective process to eliminate potential redundancy, or code creep would be to develop a uniform taskforce consisting of members from all of the different code committees to establish one standard for food trucks, independent from the existing codes.

Using a subsection of those responsible for the 5 code standards mentioned previously and likely others, chapters could be written for each food producing vehicle construction component / system, establishing clear guidelines for critical fire, life safety and health standards and expectations. Based on the lack of a single uniform standard for the construction of Food Producing Vehicles to date, varying and contradictory regulations have been published by local jurisdictions, as well as within the separate code sectors, as everyone scrambles to create something in the absence of any clear leader taking control. This is a reactionary process that has been forced on “standard creating bodies” and will continue to perpetuate until someone uniformly takes control.

Through the creation of one Technical Standards Committee focused on creating an independent construction standard for food trucks in the spirit of NFPA 1192, leveraging the knowledge of all aspects of the life, health, safety, and construction needs for food producing vehicle development and operation, a uniform expectation can be developed, communicated, and implemented.

Food Producing Vehicle market growth will become an even greater potential in a post COVID-19 world. Restaurateurs worldwide are being forced to reconsider how to deliver meals to people while social distancing. This could result in a large number of restaurant owners removing cooking equipment from their restaurants and setting up mobile kitchens,
Knowing that there is no value in reopening with half or one quarter occupancy in high rent areas. In my opinion we are well behind where we need to be based on the likely result of this pandemic.

Respectfully submitted by,

Christopher J Wagner  
Director of Compliance and Regulatory Affairs  
AmeriGas Propane  
460 N. Gulph Road  
King of Prussia, PA 19406  
O: 610-768-3637 (Please note the new office number)  
C: 610-308-3822
I favor the development of a new NFPA standard for mobile food establishments, as proposed.

I believe that a new standard is needed for mobile food establishment as they have become very popular, and all the specific requirements needed do not exist in existing NFPA standards, As propane is the fuel most commonly used for these vehicles, and NFPA has a standard, NFPA 58, which is adopted in all the United States the propane requirements should be taken from NFPA 58. I am a member of the NFPA 58 committee which has been aware of the need for propane requirements for mobile food establishments and has developed a new chapter for such requirements for the 2023 edition of NFPA 58. At a minimum, any propane requirements should be reviewed and accepted by the NFPA 58 committee.

I am interested in serving on the new committee.

Theodore Lemoff
TLemoff Engineering
Good Afternoon Standards Administration,

Please see the following as my response to the public comment questions:

1. Yes, both I and the Greater Naples Fire Rescue District are in favor of developing minimum and comprehensive fire & life safety standards for mobile cooking establishments/mobile cooking operations.

2. While current codes within NFPA 1/101/96 provide good direction, they unfortunately fall short in regards to the actual field conditions; lay out of mobile food operations, and the evolving nature of mobile food operations. The unintended lack of clear code for most situations and apparatus currently being encountered lends itself to life safety risk and inconsistent application and enforcement. The newly proposed Standard would provide for clarity and consistency.

3. Yes, I have applied to participate on the Technical Committee and have full support of the Greater Naples Fire Rescue District Fire Chief.

Thank you.

Shawn M Hanson | Assistant Chief | Fire Marshal
Fire & Life Safety Section
Greater Naples Fire Rescue District
2700 Horseshoe Drive North
Naples, FL 34104
(239) 774-2800
www.greaternaplesfire.org

Please click on the link below for a brief survey.
Customer Service Satisfaction Survey

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From: Lori Johnson <lorij@wafoodtrucks.org>
Sent: Friday, March 12, 2021 3:06 PM
To: stds_admin
Subject: Re: Form Submission - General Inquiries - Potential New Standard on Mobile Food Establishments/Mobile Cooking Operations

1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments?
Yes, we reached out to NFPA back in 2015 but there was little interest from them at the time. Since then, Washington State’s Building Code Council has implemented the new IFC 319.6 for mobiles that takes effect here statewide on July 1st of 2021. We would not want, at this time, to add even more regulation. Regarding standards for design & installation, Washington Labor & Industry already has very strict building codes in place for food trucks and trailers.

2. Please state your reason(s) for supporting or opposing such standards development.
This new IFC is requiring all our mobiles to have a fire permit in every city that is quite costly for our industry. We also do not have enough service providers to meet other IFC requirements so it is causing a strain on our small business owners.

3. Are you or your organization interested in applying for membership on the Technical Committee if the NFPA Standards Council initiates development activities on the proposed project? If yes, please submit an application*, in addition to your comments in support of the project, online at: Submit Online Application
Yes, we would be interested but could not find the application mentioned in this email.

4. Are there other organizations that you feel NFPA should reach out to?
All other state food truck associations.

Sincerely,

Lori Johnson, Executive Director
Washington State Food Truck Association, LLC
(360) 223-3801
www.wafoodtrucks.org
@wafoodtrucks

“The punishment of wise men who refuse to take part in the affairs of their government is to live under the government of unwise men.” ~ Plato

On Thu, Mar 11, 2021 at 7:20 AM Squarespace <form-submission@squarespace.info> wrote:

Sent via form submission from .

Your name: National Fire Protection Association
Subject: Potential New Standard on Mobile Food Establishments/Mobile Cooking Operations

Email: stds_admin@nfpa.org

Phone: (800) 344-3555

Message: The National Fire Protection Association (NFPA) is considering the development of a new Mobile Food Establishment Standard. Standards development will include requirements to provide minimum fire and life safety provisions for mobile food establishments including design, installation, operation, inspection and maintenance of the cooking equipment, systems and mobile unit.

With the growing popularly of mobile food establishments (commonly referred to as food trucks) and the rising number of related safety incidents, recent updates have been proposed in two existing NFPA Standards (NFPA 58, Liquefied Petroleum Gas Code and NFPA 96, Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations) to address fire and life safety concerns.

NFPA is seeking comments from all interested organizations and individuals to gauge whether support exists for the development of a new NFPA Standard for mobile food establishments/mobile cooking operations.

More information can be found in the February 2021 NFPA newsletter.

Please provide comments on the following:
1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments?
2. Please state your reason(s) for supporting or opposing such standards development.
3. Are you or your organization interested in applying for membership on the Technical Committee if the NFPA Standards Council initiates development activities on the proposed project? If yes, please submit an application*, in addition to your comments in support of the project, online at: Submit Online Application
4. Are there other organizations that you feel NFPA should reach out to?
*Note: Applications are being accepted for purposes of documenting applicant interest in committee participation. Acceptance of applications by NFPA does not guaranty or imply the Standards Council will ultimately approve standards development activity on this subject matter.

Please submit all comments to Standards Administration, in support or opposition for standards development on mobile food establishments by March 26, 2021: stds_admin@nfpa.org
Maynard, Mary

From: Way, Dale <DWay@tmfpd.us>
Sent: Friday, October 2, 2020 3:18 PM
To: stds_admin
Subject: Mobile Food Establishments/Mobile Cooking Operations

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Regarding the following questions on Mobile Food Establishments:

1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to minimum fire and life safety provisions for mobile food establishments? No.

2. Please state your reason(s) for supporting or opposing such standards development.

   From a code perspective, we do not regulate fuel trucks driving on the road because they are regulated by DOT. Since these mobile food establishments are a commercial vehicle, DOT regulations also apply to them. As AHJ’s we do not require an Inspection and Operational Permit of every work truck kept at someone’s residence or in front of their residence that has an oxygen/acetylene set up or multiple acetylene tanks on it.

   From a jurisdictional enforcement perspective, this is literally a moving target and overregulates this industry by requiring inspection by each AHJ they set up shop in from Business Licensing, Health, possibly Parking Enforcement, etc.

   I was opposed to ICC including regulations in the 2018 IFC.

Respectfully,

Dale Way
Deputy Fire Chief – Fire Prevention | Truckee Meadows Fire & Rescue
dway@tmfpd.us | Office: 775.326.6000
3663 Barron Wy, Reno, NV 89511

"Committed to excellence, service, and the protection of life and property in our community"
MEMORANDUM

To: NFPA Standards Council
From: NFPA Staff
Subject: Recommendation Regarding New Project Initiation Request for Standalone Cannabis Standard Development

After internal review and the review of the 77 comments (as of March 29, 2021) received from stakeholders on this new project request, staff recommends the following actions for review and consideration by the Standards Council:

1) Approve the formation of a standalone standards development project (“NFPA 420”) to address cannabis facilities as follows:

   TC Scope – This committee shall have primary responsibility for documents on cannabis facilities and spaces including growing, processing, storage, and related activities.

   NFPA 420 Draft Document Scope - The standard shall apply to cannabis facilities and spaces including growing, processing, storage, and related activities within new and existing buildings and occupancies.

2) Establish a start-up Technical Committee roster at the August 2021 Standards Council meeting. Currently, NFPA has received interest from 19 potential TC members and will continue collecting applications.

3) Establish a Task Group between NFPA 1 (FCC-OCP) and NFPA 420 in August to address the plan for existing requirements within NFPA 1. It is expected that NFPA 1 will continue to work on development of Chapter 38 until NFPA 420 is issued. Should NFPA 1 desire to maintain requirements related to cannabis after issuance of the initial edition of NFPA 420, the requirements should be extracted from NFPA 420.
a. Explain the Scope of the new project/document:

**Recommended Practice for Cannabis Processing Facilities**

The scope of this document is to safeguard property, operators/employees, the general public, and first responders from fire & explosions, hazardous materials, electrical hazards, and/or other dangerous conditions that threaten life safety at cannabis processing facilities. It would include specific guidance for the following, with a future goal of becoming a standard that could be adopted by fire codes for a single concise document to safely and uniformly regulate the cannabis industry:

- Indoor growing (i.e, pesticide application / use, lighting systems, carbon dioxide enrichment systems, aisle widths between plants, safety provisions for first responder, guidance for construction topics not addressed by national building codes, etc.)

- Cannabis oil extraction processes (i.e. extraction room design, extraction equipment design, approval process of extraction equipment using hazardous materials, extraction room exhaust systems, safe methods to operate extraction equipment, liquidified petroleum gas (LPG) transfers, LPG storage, post oil processing using hazardous materials, and other related safe guards to the extraction process)

- Recommend inspection criteria and personnel training/certification.

Additional guidance could also be provided regarding testing laboratories and sales locations specific to the cannabis industry as the committee sees fit. The document may also include supporting information for understanding the extraction and oil refining process (in an appendix?), so it can be better understood and not over or under regulated.

Unless otherwise sought by public input, it is not the intent to include food / ingestible regulation topics typically regulated by the Department of Health / Food and Drug Administration, outdoor farming operations currently regulated by agricultural standards, or security topics for the prevention of crime such as cameras, data storage, intrusion alarm, etc.

b. Provide an explanation and any evidence of the need for the new project/document:

1) With the City and County of Denver being the first to decriminalize the sale and use of recreational (cannabis) marijuana, the Denver Fire Department has put a significant amount of time and effort researching applicable codes, regulating, and inspecting this new industry. Having gone through this experience and seeing the development of new fire code sections becoming available, requirements are high-level, at times ambiguous, and leaves topics open to interpretation. As more states decriminalize marijuana, the Denver Fire Department consistently receives requests asking how fire and safety regulations apply to cannabis processing and how they have been enforced (from other regulatory jurisdictions and the design community). Based on the discussions had, it is evident that there is a need for a guidance document relating to this new industry. Denver Fire Department has been regulating the cannabis industry for 10 years and still received such requests. A recommended practice, guide, or standard for this industry could set a uniform level of safety across the country and the world; more importantly it could be evolved by NFPA’s consensus approach. What better name for this document, the unofficial number for the industry, NFPA 420.

2) Although fire codes are starting to catch up with the cannabis industry, now including chapters specifically for cannabis, a fire code is not the appropriate document to capture all the details necessary surrounding safe operations. Just as industry specific NFPA standards exist, NFPA 664 for woodworking, NFPA 318 for semiconductor fabrication facilities, this industry warrants a dedicated document to ensure safe operations. There are topics such as the following which are more appropriate in a recommended practice, guide, or standard versus a fire code in which topics can be and discussed in the detail necessary for this new industry (this is not an exhaustive list):

   a. Detail methods of safe extractions processes need to be established. With extraction equipment becoming more complex and the demand for continuous extraction operations evolving, limits of how to safely operate LPG extraction equipment need to be
established. For instance, when the industry started, close loop extractors were designed to recollect as much LPG as possible and then the machine would be opened for oil retrieval. To expedite operations, some extraction operators open the equipment early and "hot pour" liquid LPG / oil mixture from the machine. Additionally, manufacturers are now building in pour spouts at the bottom of collections pots, which can and are being used to open blast oil from the equipment using LPG pressure in the machine. Are these operations safe? Should they be allowed? Should extraction equipment be designed with safeguards with restrict unsafe operations? Are the exhaust systems being designed for this amount of LPG release? Topics such as these need to be addressed.

b. Guidelines surrounding safe processing after the initial extraction, including post oil processing, need to be established. These include how to safely store LPG or flammable liquid soaked spent plant material to off-gas, when is it safe to remove plant material from the extraction room / exhausted enclosure, safety surrounding glassware use including THCA crystal production in LPG filled glassware, flammable liquid stored in plastic containers, small scale flammable liquid pumping, what if any hazardous material use can be conducted outside of an exhausted system versus within, etc.

c. Safe storage of LPG: Many refer to NFPA 58 as the overall governing document for LPG, however this industry is not using LPG in the ways the foundation of NFPA 58 was originally established. Although NFPA 58 is looked upon for guidance, it may not regulate all topics the ways in which the cannabis industry uses LPG. For instance, the industry uses non odorized LPG; should the same requirements be applied for indoor LPG storage using odorized vs non odorized LPG?

d. Extractors are equipment that process hazardous materials (LPG, CO, etc) and warrant (annual?) inspections just as is required for with other equipment processing or storing hazards materials. Currently no Fire Code addresses the topics of inspections of this equipment (at least after 1st acceptance). For instance, there are wear components on extraction equipment that will require routine replacement. There is no validation to ensure bolts, hoses, quick disconnect couplings, or other components have been replaced with the correct type or that the equipment has not been altered from the manufacturers’ equipment approvals. Standard LPG tanks have hydrostatic pressure testing requirements, however this industry many times uses proprietary tanks which are not regulated under NFPA 58. Inspections are needed to ensure the safe operation of equipment thru time. Inspection frequency, items to be inspected, onsite operator vs certified inspector inspections, etc need to be established.

e. Inspections performed by fire officials can be overwhelming in these facilities as they do not fit into the typical occupancies inspected in their jurisdictions. The creation of a recommended practice document would help fire officials create inspection guides as a basis to perform fire inspections; either by using the document itself or inspections topics can be added to an appendix. This would additionally inform cannabis processers to the critical topics being evaluated during a fire inspection and avoid potential unexpected code violations.

f. Training and certification: The required inspections noted above for extraction equipment need to have an established criterion to certify the inspector performing these inspections. Either by including the criteria in the NFPA document or by adopting another certification criterion if existing. Training and certification of extraction operators is needed and should be required. NFPA 58 has similar requirements for trained personal performing filling operations and this industry should have a minimum certification to operate equipment.

g. Consistency of regulation and ease of use: Because this industry is new, it is difficult for designers, regulators, and the end users to piece together all of the code paths to regulate the industry. Whether construction topics, distance between grow tables, allowing indoor LPG transfilling indoors without following NFPA 58, the construction of extraction equipment, what is appropriate for a cannabis extraction hazard analysis, how to protect grow arrangements outside the scope of NFPA 13, etc; these ambiguities and subsequent code interpretations lead to non-uniform regulation, confusion to designers, and operators. A single document that regulates or guides AHJs, designers, and operators will lead to better and consistent regulation, safer operations, and is easier
for non-code readers to have a single place to find regulations and/or best practices and an understanding of the industry.

h. Growing operations are performed indoors in Colorado and most other states decriminalizing cannabis. This indoor growing poses risks that are typically not seen in most other agriculture industries. Most notably, growing can occur in a multi-tenant building; i.e. there can be a business occupancy next door to a cannabis grow occupancy. Carbon Dioxide (CO2) enrichment, the process of flooding grow rooms with CO2 to enhance plant yield, is used by many growers. Even with the adoption of fire code CO2 requirements in the beverage dispensing industry, CO2 enrichment is an entirely different system with different safety concerns. An installation standard is needed that can go into the needed details for hoses, valves, couplings, etc as with any other system that can affect the life safety of occupants exposed to the system during normal operations of a system upset. Furthermore, routine inspections of the system and detection equipment also need to be established.

i. Grow processes are extending beyond 12’ in height, typically on racks and sometimes compact shelving. Should growing at these heights be regulated as high pile storage? Topics regarding commodity classification, flue spaces, and grow lamps within racking do not quite fit the mold for high pile storage. Specific guidance for growing at these heights can be recommended so that it is specific to this industry and not left up to interpretation what highpile storage requirements apply.

j. Pesticide use and fumigation processes in grow rooms need better safety guidance. These are significant life safety concerns to adjacent tenants, first responders, and cannabis business staff when not performed safely. Signage requirements should be established when the room is safe to enter and when product was applied. Evaluation on whether the application / fumigation process can affect other tenants in the building should be included and potentially prohibited. Fumigation processes can negatively affect CO2 detection equipment, therefore it essential these processes be evaluated or controlled.

3) With the decriminalization of commercial growing & sales and personal possession, decriminalization often also includes growing and extraction at home or in an residential location. Although home growing and extraction is often not regulated by the fire codes through the review, permitting, and inspections processes, there is a need for the home grower / extractor to have a guidance document on how to grow and extract safely. It is not the intent to allow the use of LPG or other large-scale operations within a dwelling or outside of a commercially permitted extraction facility, however there are methods of extractions, growing, CO2 enrichment, etc that warrant public education of the safe guards that should be followed to protect themselves and their neighbors. This may include use of small volumes of flammable liquids, discussion of listing requirements of electrical components such as extractors and lighting systems, and CO2 use.

c. Identify intended users of the new project/document:
The users of the document would be Authorities Having Jurisdiction, Architects and Engineers, home growers/extractors, installing contractors, and cannabis processing facility operators.

d. Identify individuals, groups and organizations that should review and provide input on the need for the proposed new project/document; and provide contact information for these groups:

<table>
<thead>
<tr>
<th>Organizations</th>
</tr>
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<tbody>
<tr>
<td>- Members of the International Association of Fire Marshals</td>
</tr>
<tr>
<td>- ICC Fire Service and Building Official membership</td>
</tr>
<tr>
<td>- Marijuana Industry Group: (<a href="mailto:truman@marijuanaindustrygroup.org">truman@marijuanaindustrygroup.org</a> )</td>
</tr>
<tr>
<td>- Cannabis Certification Council (formerly Organic Cannabis Association) - <a href="mailto:ben@cannabiscertificationcouncil.org">ben@cannabiscertificationcouncil.org</a></td>
</tr>
<tr>
<td>- National Association of Cannabis Businesses - <a href="mailto:gina.kranwinkel@nacb.com">gina.kranwinkel@nacb.com</a></td>
</tr>
<tr>
<td>- National Cannabis Industry Assoc. - <a href="mailto:aaron@thecannabisindustry.org">aaron@thecannabisindustry.org</a>; <a href="mailto:andrew@thecannabisindustry.org">andrew@thecannabisindustry.org</a></td>
</tr>
<tr>
<td>- Colorado Cannabis Manufacturers Association - <a href="mailto:kgallagher9321@gmail.com">kgallagher9321@gmail.com</a></td>
</tr>
<tr>
<td>- Members of Fire Marshals Association of Colorado - <a href="mailto:knsnow@springs.gov">knsnow@springs.gov</a> ; <a href="mailto:jpike@rwbfire.org">jpike@rwbfire.org</a></td>
</tr>
</tbody>
</table>
**Extraction Equipment Manufacturers**

- Kelly Knutson IES (kknutson@isolatesystems.com)
- Extraction Tek Solutions (marcusfauth@gmail.com)
- MC Machinery (info@incredibleextractor.com)
- Apeks Supercritical (natea@apekssupercritical.com)
- Eden Labs (acbraddock@edenlabs.com)

**Individuals**

- Brett Miller AIA (Brett@millerdw.com)
- Chris Witherell P.E. (chris@psinspectors.com)
- Dan Dulaney – AIA (dan@dulaneyarchitecture.com)
- Kris Belter – AIA (KBelter@igarch.com)
- Todd LaBerge – P.E. (talaberge@lbl.gov)
- Sarah Kaiman - greenhygieneconsulting@gmail.com
- Sean Donohue – sdonohue@jensenhuics.com

**e. Identify individuals, groups and organizations that will be or could be affected, either directly or indirectly, by the proposed new project/document, and what benefit they will receive by having this new document available:**

UL has recently published UL 1339 which focus on equipment listing. NFPA 1 and IFC have cannabis chapters. Regulatory agencies, design professionals, extraction equipment manufacturers, and operators of cannabis processing facilities will all benefit from this document by having a uniform recommended practice document to follow.

**f. Identify other related documents and projects on the subject both within NFPA and external to NFPA:**

- 2018 NFPA 1
- 2018 IFC
- 2019 Denver Fire Code amendments
- UL 1339

**g. Identify the technical expertise and interest necessary to develop the project/document, and if the committee membership currently contains this expertise and interest:**

This is a new document and a committee would need to be created. It should consist of fire authorities with experience in cannabis processing facilities, practicing design professionals in the cannabis industry including architects / engineers involved in the design of building systems, engineers involved in the design/review of extraction equipment using hazardous materials, extraction equipment manufacturers, and operators of cannabis processing facilities.

**h. Provide an estimate on the amount of time needed to develop the new project/document:**

The time to create this document is unknown, however the ideal time to complete the standard would be 1 year.

**i. Comment on the availability of data and other information that exists or would be needed to substantiate the technical requirements and other provisions of the proposed new project/document:**

Current City and County of Denver Fire Code and Washington State Fire Code have amendments which can be used for some basis. 2018 IFC and 2018 NFPA 1 have cannabis chapters. Portions of other standards / codes can be referenced such as NFPA 58 for butane extractions, NFPA 70 for electrical codes, etc.

**Please send your request to:**

NFPA
Codes and Standards Administration
1 Batterymarch Park
Quincy, MA 02169
Stds_admin@nfpa.org
Rev. 6/16

**Signature:**

Name: Brian Lukus P.E.
Email: Brian.Lukus@denvergov.org
Affiliation: Denver Fire Department, NFPA member #1087605
To Whom it may Concern,

The AFAA supports the growing concern for developing a standard around the fire protection of Cannabis Growing and Processing Facilities. We would support the Committee if it has a stand alone Standard or if it has a TC as part of NFPA 1.

I am the Chair of the AFAA Codes & Standards Committee. We are also applying for representation on the standard and wish to be a part of the code making process of this emerging occupancy and the need to determine the best methods of protecting people and property within these occupancies.

All the Best,

Christopher Creamer

DynaFire

c: 407.947.1386
o: 407.830.6500 ext. 8390
109 Concord Drive, Suite B
Casselberry, FL 32707
www.dynafire.com

"Protecting lives and property through leading technologies and quality service while creating valuable relationships."
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Please accept the following responses to the Fire Protection of Cannabis Growing and Processing Facilities survey.

1. Are you, or your organization, in favor of the development of an NFPA Standard pertaining to the fire protection of cannabis growing and processing facilities? I am in favor, I believe it is needed and possibly long overdue.

2. Please state your reason(s) for supporting or opposing such standards development. For inspectors/plans examiners it is an arduous task for them to compile all the necessary requirements and develop a list of regulations that need to be enforced, including building, fire and electrical.

3. Are you or your organization interested in applying for membership on the Technical Committee if the Standards Council initiates development activities on the proposed project? I applied for the committee prior to submitting these responses.

4. If yes, please submit an application, in addition to your comments in support of the project, online at: Submit online application* I submitted an application already.

Kind Regards,

Michael L. Savage, Sr., MCP, CBO, CFPS, CEI-M
Director/Building Official
Department of Building Safety
Director – ICC Board of Directors

Marion County Board of County Commissioners
2710 E. Silver Springs Blvd., Ocala, FL 34470
Main: 352-438-2400 Direct: 352-438-2435
Empowering Marion for Success!

*Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.*
I don’t know a lot about cannabis processing, but I have heard that it is a common practice to transfer butane inside the processing buildings as part of the active ingredient isolation process. Then the butane, which is supposed to be recycled, is instead released as an expediency to process more cannabis. Enough butane is released to reach the lower flammability limit in parts of the room.

This came up and was discussed as part of an NFPA 58 technical committee meeting. We determined it was out of the scope of 58 but needed to be investigated.

Richard Fredenburg
Member of technical committees for 30A, 58, 59, 67, 68, 69

Please don’t print this unless you really need to!

Richard Fredenburg, LP-Gas Engineer
North Carolina Department of Agriculture and Consumer Services, Standards Division
Telephone 919-707-3231
Fax 919-715-0524

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.
Hello,

1. Are you in favor of the development of an NFPA Standard pertaining to the fire protection of cannabis growing and processing facilities?  
   I am in strong support of such a standard.

2. Please state your reason(s) for supporting or opposing such standards development.
   As a Building Department review engineer for a major jurisdiction in one of the early states to adopt both medical and recreational use of cannabis, the lack of regulatory guidance in all the phases of the industry, from growing to infusions, created inconsistent and inappropriate application of portions of codes and standards developed for other industries and operations. Consolidating consistent and appropriate regulation into a single NFPA standard is badly needed and would be hugely beneficial.

3. Are you interested in applying for membership on the Technical Committee if the Standards Council initiates development activities on the proposed project?  
   Unfortunately I am unable to apply at this time.

Thank you.
100% in support of such a standard.

Michael Stewart FPE
971.235.1310
Maynard, Mary

From: Dailide, Adam (LARA) <DailideA@michigan.gov>
Sent: Friday, January 22, 2021 1:21 PM
To: stds_admin
Subject: Comments on new project request for fire protection of cannabis growing and processing facilities

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NFPA 1 chapter 38 covers the surface of marijuana facilities but the industry as a whole needs further regulation. I support this issue becoming an NFPA standard for the safety of its occupants and the communities around them.

As a member of the Michigan Marijuana Unit, I have been on board since the start of our program in 2018 and have approved over 588 facilities in our state to date. I welcome the chance to have a standard to reference on issues that are specific to the Marijuana industry.

Adam A. Dailide (Die-Lee-Duh), M.Arch
Consultant
Marijuana Unit

Bureau of Fire Services
611 W. Ottawa St., 4th Floor
Lansing, MI 48933

Ph: 517.335.4057
Email: DailideA@michigan.gov
www.michigan.gov\bfs

This message w/attachments (message) is intended solely for the use of the intended recipient(s) as information to aid in their decision making processes and may contain information that is privileged, confidential or proprietary. This information is not advice on what to do, and not to be used in replacement of a design professional. If you are not an intended recipient, please notify the sender, and then please delete and destroy all copies and attachments, and be advised that any review or dissemination of, or the taking of any action in reliance on, the information contained in or attached to this message is prohibited.
Good morning,

I would like to submit a vote, “in support” for the development related to fire protection of cannabis growing and processing facilities.

Thank you

Brian Weidman  
Deputy Fire Marshal

Long Beach Fire Department | Fire Prevention Bureau  
3205 Lakewood Blvd. | Long Beach, CA 90808  
Office: 562-570-2572 | FAX: 562.570.2566
Hello,

I am in support of the creation of this standard. It would be a great help for all in the industry.

Sincerely,

Vincent Olea
Cannabis Plan Checker/ Cannabis Inspector

Long Beach Fire Department | Fire Prevention Bureau
3205 Lakewood Blvd. | Long Beach, CA 90808
Office: 562-570-2569 | Fax: 570-2566
Vincent.olea@longbeach.gov

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
To Whom it May Concern:

Please see the following responses in regards to the newly proposed Cannabis Fire Protection Standard. Please note, the following responses reflect only my individual opinions on the topics presented.

- Are you, or your organization, in favor of the development of an NFPA Standard pertaining to the fire protection of cannabis growing and processing facilities?

I am personally in favor of the development of a Cannabis Cultivation and Processing Facilities standard.

- Please state your reason(s) for supporting or opposing such standards development.

The legal cannabis market is spreading quickly and becoming more accepted by the citizens and state government entities of the United States. I believe that federal legalization is inevitable, and a fire protection standard must be developed in order to provide life and property safety to the cultivation and processing facilities within the cannabis industry. Cannabis brings a new challenge to the world of fire protection, as it seems to be a mesh of agricultural and pharmaceutical occupancies.

Regardless of one’s viewpoint on the legality of cannabis, I believe the industry will continue to grow, and life safety should be of the utmost importance in any industry. Minimum design standards should be established, and direction for alternate means of suppression should be provided for guidance.

I have attached my most up to date resume for review.

Thank you for your time.

Ethan Brown  M.Eng.FPE, EIT
Fire Protection Designer

Interface Engineering, Inc.
503.382.2678
100 SW Main Street, Suite 1600
Portland, OR 97204
www.interfaceengineering.com
The Seattle Fire Department is in support of this new standard.

We have been dealing with this industry for many years with not much guidance and are willing to participate if necessary in the development.

Thank you,

Ken Brouillette
Technical Code Program Manager
Fire Prevention Division – Seattle Fire Department
206.386.1455 | ken.brouillette@seattle.gov
Maynard, Mary

From: Brian S. Geraci -State Police- <brian.geraci@maryland.gov>
Sent: Tuesday, January 26, 2021 11:04 AM
To: stds_admin
Subject: Cannabis Fire Protection Standard

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We are in support of NFPA developing a new standard regarding fire protection within the cannabis industry. This is a growing industry here in Maryland and it continues to grow as laws are changing regarding this industry each year in the general assembly. A separate standard would put more focus on this industry and the committee would be beneficial with this as a sole document.

Brian S Geraci
State Fire Marshal
Maryland Department of State Police
Office of the Maryland State Fire Marshal
1201 Reisterstown Road, Building C
Pikesville, Maryland 21208
brian.geraci@maryland.gov
410-653-8980 (O)
Website | Facebook | Twitter
Good morning to the Standards Committee,

I wanted to reach out and share a deep and strong support for the development of the proposed Standard NFPA 420 *Fire Protection of Cannabis Growing and Processing Facilities* from both an Industry perspective and an Enforcement perspective (I have submitted an application for the NFPA 420 committee, should NFPA choose to move forward with the development of the Standard).

My support comes from both the Industry side and the AHJ side, as I have the opportunity to work with both sides of the issue in depth. My thoughts and support are as noted below, coming from a background deep in the extraction industry for facility design and code compliance as an independent Fire Protection Engineer/ Industry Representative, and also as a member of Code and Standard technical committees for NFPA, IFC, and UL as an Authority Having Jurisdiction (AHJ). I am happy to share my thoughts further, beyond an email, if it would prove useful.

I’ve had the good fortune to work with over 150 cultivation and extraction facilities across the United States, Canada, and South America, and have noted a significant gap in background and understanding of the hazards by those who design these facilities as well as those who are charged with regulating these facilities. The knowledge gap could be readily closed and the associated risks greatly reduced if there was a solid Standard to accompany the Codes (NFPA 1 Chapter 38 and IFC Chapter 39). From the industry side, I have been providing Fire Protection Engineering consulting to equipment manufacturers, extraction booth manufacturers, industry trade groups, and design firms (A&E and MEP engineering companies), as they are in dire need of prescriptive guidance of design and construction. Additionally, facility operators and local fire code officials would greatly benefit from prescriptive language as to how to maintain the facilities, when to conduct ITM activities, employee training and certifications, and general fire safety. The needs and gaps are significant.

I currently sit on the committees for UL 1389 and UL 61010-1 and have been actively working with the cannabis industry to understand the *listing* requirements and their application to equipment certifications. From a code perspective, I also sit on NFPA 101 *Life Safety Code* Committee for Industrial, Storage, and Miscellaneous Occupancies, as well as NFPA 400 *Hazardous Materials Code*. Lastly, I also serve as an interested party to IFC Chapter 39 *Plant Processing and Extraction*. The Codes can certainly cover the basic “where and when” requirements; however, the “how” is widely variant and generally nonexistent. NFPA 420 could provide the much needed “how” to these facilities, to ensure the growth of the industry is proliferated safely and in an economically feasible manner.

**Industry Support:** I serve on the Facility Design Committee for the National Cannabis Industry of America (NCIA), working collaboratively across the industry as-a-whole to establish a universal set of design criteria and code compliance issues across the United States for both ICC states and NFPA 1 states. The Industry is in dire need of a set of broad criteria, and the NCIA Facility Design Committee is covering a host of issues from life safety and fire protection, to food safety, GMP standards, and ISO requirements. I am happy to support the development of the Standard as an Industry concern. I have
reached out to the NCIA Executive Board to seek their support and interest in this as well. Integrating NFPA 420 and the NCIA would be a fantastic collaboration and partnership.

**Code Authority Support:** By day I serve as the Fire Marshal / Managing Fire Protection Engineer for the Berkeley National Laboratory, and as a Code Enforcement agent, I have been providing training to over 600 Fire Code and Building Code officials for the past three years on extraction facilities. The number one priority for these AHJs is to get the Codes and Standards more deeply developed to facilitate the year-over-year safe operation of these facilities.

Certainly there is quite a bit to unpack with the items mentioned above, and am happy to provide more background and content highlighting the deep need for a Standard such as NFPA 420. Please do not hesitate to contact me if there is any more information I can provide.

Best regards,
Todd LaBerge

---

TLB Fire Protection Engineering, Inc.

Industrial & Warehousing Fire Protection Solutions

**Todd LaBerge, P.E.**  
**TODD@TLBFPE.COM**  
**FIRE PROTECTION ENGINEER**  
**408-718-3356**
I am in favor of the development of an NFPA Standard pertaining to the fire protection of cannabis growing and processing facilities.

**Jason Grant**  
CFI-2 CFPE  
Life Safety CEO / Plan Reviewer  
Permitting and Inspections Department

City of Portland  
389 Congress Street  
Portland, Maine 04101  
Phone: (207) 756-8187

Notice: Under Maine law, documents - including e-mails - in the possession of public officials or city employees about government business may be classified as public records. There are very few exceptions. As a result, please be advised that what is written in an e-mail could be released to the public and/or the media if requested.
We have a cannabis facility going up in our town. I got resistance when I requested suppression. I know of another jurisdiction in Michigan who had a facility build specifically to bypass suppression. While there may be an issue with the suppression water not being pure like their irrigation system isn’t it better for the plants than fire? I feel that due to the fire load suppression should be required in all grow facilities regardless of the sqft of the area. It’s ironic they didn’t fight my additional hydrant request only suppression.
Of corse!!
Can never have enough attention paid to possibly of fire protection!!
Every environment that has a potential for a fire, Needs every opportunity and technology available to prepare and prevent exposure to a fire incident or event.
Doesn’t matter the industry!!
Safety first!
Should not just be a slogan
Needs to be a practice.
1. Yes, currently as the AHJ I have one large facility in our City and I have found inspecting these facilities to be unique and challenging. Especially since they are heavily federally regulated.

2. Having a code or standard will allow for more thoughtful and specific guidance. I have no doubt the committee will look at how NFPA codes and standards will impact and implement against federal regulations.

3. Yes

Adam Hughes
Deputy Chief - Prevention
Rochester Fire Dept.
37 Wakefield St.
Rochester, NH 03867
P. 603-335-7545
F. 603-332-9711
I regularly review cannabis operations from top to bottom regarding protection, gas detection, flammable liquid storage/use/handling, hazardous gas evacuation, mechanical interlocks, and what is feel is the most important reason for a standard - technical reports as referenced by the IFC. There is such a lack of consistency in the items covered by technical reports, a lack of knowledge from owners as to what and why things are required, and such a divide in types of equipment and extraction media used that I feel a standard would be very useful for the industry. And I am typically not one to push for such things. I’d certainly be interested if the development stage is pursued. Good luck.

Sent from my iPhone
Spencer Tomlinson
Cell: 620-955-7293
Some thoughts for consideration:
Comments from our local building inspector.

I would just look at it like I would for building issues as in a greenhouse type area. These are just my thoughts and not sure if all would apply in the fire code.

Make sure proper isles are identified with exits clearly marked throughout the growing life of the plants (so the exit lights and egress paths are not blocked by the growing plants)
Once the plants reach the proper harvesting peak will they be dried naturally slow or dried in a kiln either way we need the additional fire protection to protect the building from excess consumables that may catch fire.
If harvested then piled inside then proper procedures to prevent decomposition and possible combustion.
If kiln dried (forced or rapid dry) proper exhaust of vapors
The grow lights should be maybe protected or sealed to keep flammables from touching hot parts as they are usually pretty close to the plants
Proper fire control- sprinklers, fire alarms, spark arrestors on forklifts, ventilation, and signage not to enter without respiratory masks to protect from the vapors produced that may be a confusing agent.
Humidity control or proper circulation of air to prevent any molding issues in or on the structure.
Proper maintenance of building in the high humidity structure, or the building was designed for this type of use (reuse of existing buildings would need mandatory upgrades)
Proper disposal of all non-cannabis producing parts of the plants
Certification/license of all of operators/workers.
Proper security for the building, zoning, proper setbacks from property lines and from other uses that conflict (schools).

Local ordinances would supersede recommendations.

Thank you,

Chief Jay Heckel
Marinette Fire Department
1450 Main St.
Marinette, WI 54143
715-732-5179 (O)
715-923-3806 (C)
MABAS DIV. 144
In response to the National Fire Protection Association’s (NFPA) request for comments to determine if support exists for the development of a new cannabis fire protection standard, the Phoenix Fire Department (PFD) submits the following for consideration:

Are you, or your organization, in favor of the development of an NFPA Standard pertaining to the fire protection of cannabis growing and processing facilities?

Yes. We believe that rapid expansion of the cannabis industry nationwide necessitates a comprehensive fire protection initiative to address the unique hazards present. Specifically, for the PFD, with the State of Arizona legalizing medical and recreational usage of cannabis, we expect significant industry growth and therefore are in favor of the development of a national consensus standard.

Please state your reason(s) for supporting or opposing such standards development.

Important factors exist for both life safety and fire protection/suppression in cannabis related facilities. Since cannabis growth, enrichment, and distribution can be present at these facilities, the PFD recognizes the unique occupancy challenges present. This includes but is not limited to: occupancy limits, egress for customers and staff, firefighter access, high electrical loads, unique lighting systems, hazardous materials usage for grow process and enrichment, and the potential for heartened barriers. As a result, the PFD believes the development of a timely national consensus standard that identifies the best practices for fire prevention efforts, emergency response, and public education is paramount.

On behalf of Fire Chief Kara Kalkbrenner, thank you for your consideration and please let us know if we can be of assistance.

Sincerely,

Scott Walker
Executive Assistant Fire Chief
Phoenix Fire Department

Tim Kreis
Assistant Fire Chief
Phoenix Fire Department
I fully support the initiative to develop a new Standard for Cannabis Cultivation & Process Extraction. I have had the opportunity over the past 4 years to conduct code reviews and fuel load code reviews for 6 new facilities. I have also conducted two fire investigations in the past 2 years for two facility fires. Both of these fires were caused by Halogen lamps exploding and setting fire to the polystyrene beds on top of the stainless steel grow beds. In second fire we actually have a video during the night when the lamp exploded. The hot glass started the grow bed on fire and the whole crop in the room was destroyed,
I feel that the suppliers of these grow beds need to come up with a better product that does not burn and melt.. S. Mackenzie
Good Morning.

I am 1000% in support of this idea. Currently, Moveable Storage Racks are a very popular option for growing a lot of plants in a small space. As usual, most architects don’t like to hear that they need more sprinklers, so telling them that they need in rack sprinklers is not too popular. When designing systems like this, I use moveable rack storage standards with solid shelves and class IV commodity (there’s a plastic drip tray below) in chapter 16. That’s the closest I can find to this and I treat it like rack storage. As a former Lieutenant on a Volunteer Fire Department in Connecticut, I have seen fires in commercial buildings where I know there should have been more sprinklers.

These rack storage grow facilities need to be kept in mind when making the standard as I’ve seen them up to 30 ft tall without any in rack sprinklers (not my designs). Please develop this code sooner than later, but don’t rush it. There is a lot to consider in this field.

Thank you!

David Ricard – Fire Protection/Plumbing Designer, CAD Technician
Extension 119
Cell: 860.515.9215