August 9, 2023

National Fire Protection Association
Standards Council
1 Batterymarch Park
Quincy, MA 02169-7471

Re: Appeal by ChargePoint, Inc. of NFPA 30A-2024 Second Draft Report

To the NFPA Standards Council:

We write on behalf of Electrify America, LLC (“Electrify America”), the largest open network of fast DC chargers in the United States. Electrify America operates more than 3,500 chargers across over 800 sites. Electrify America’s vision is to foster the electrification of transportation by providing an expansive network of convenient, reliable, customer-centric chargers.

We participated in the June 2023 Technical Meeting regarding Proposed NFPA 30A-2024, Code for Motor Fuel Dispensing Facilities and Repair Garages. We spoke in favor of Certified Amending Motion (“CAM”) 30A-30, submitted by the National Electrical Manufacturers Association, which the membership adopted by a vote of 178-89. We support the appeal lodged by ChargePoint, Inc., on July 12, 2023 (the “NFPA 30A Appeal”) regarding NFPA 30A, and we urge the Council to grant ChargePoint’s appeal.

In particular:

1. We agreed with the concerns raised by the National Electrical Manufacturers Association (“NEMA”) in CAM 30A-30, which asked the NFPA membership to consider the recommendations in Public Comment-34 to delete all the unsubstantiated and unnecessary requirements proposed to be added to the code by First Revision-31 and Second Revision-8.

2. We share the concerns as those raised in the NFPA 30A Appeal, that the proposed amendments to NFPA 30A were not backed by appropriate research or data or relevant expert technical expertise, and inappropriately attempted to regulate EV chargers as a potential source of ignition.

As we pointed out to the membership at the technical meeting, the proposed amendments to NFPA 30A were not supported evidence that EV chargers pose greater risks than liquid fueling that would
warrant the severe restrictions that the amendments would impose. The membership, responding to these observations and input from many other speakers, overwhelmingly agreed with CAM 30A-30.

We agree that the appropriate course of action in light of CAM 30A-30 passing, is not for the technical committee to revert to the prior edition of the code but rather for an affirmative clarification that electric vehicle charging, is already governed by, and falls within the scope of the NEC-AAC, and any Gas Station specific criteria for electrical equipment are, or can be, contained in Chapter 8, with operations / maintenance issues in Chapter 9.

Yours truly,

Squire Patton Boggs (US) LLP

Keith Bradley
Please formally enter into the record of discussion for NFPA 30A at the 24 August 2023 Meeting.

The problem with pushing against Chapter 15 is people don’t understand catastrophic potential or, perhaps, care about the temporary Classified areas newly defined in NFPA 30A in Figures A.15.3.2.1(a & b). The other real-world hazard is the down-gradient/pooling areas for flammable liquids from the delivery & dispensing areas included in 15.3.3 that exist in nearly every convenience store in America. Sadly, there must be a plethora of money to be made for totally disregarding the safety of patrons at these ever-more prevalent hybrid fueling stations. Just like any other time making money gets interjected into industry standard codes... sadly, people will have to be killed by tragic accidents, which could have been prevented with the proactive collaboration of NFPA 30A committee, to finally have novel thoughts, like those included in Chapter 15, intended to protect against worst case scenarios, which is the intent of NFPA. I just pray the people that will eventually be killed because of this Chapter 15 reduction/removal are not my family or friends. I will do my best to teach my family and friends to recognize and avoid unsafe hybrid stations. Maybe, California will adopt the newly defined Classified areas defined in Chapter 15, considering the real danger of down-gradient pooling areas, and embolden other state AHJs to be more proactive to save lives? For those that lobbied and voted against Chapter 15, for whatever reason, I hope you can live with the potential loss of life you just created nationwide... even worldwide. Someone will need big funds to pay for the lawsuits from the families that lose loved ones in these future tragic events.

The next scenario segment was meant to be read at the NFPA meeting in Vegas but did not make it in time.

As we all know, Industry Standard Codes of Practice, like NFPA 30A, are designed and written to minimize the potential for catastrophic events.

There must be required parameters to keep patrons safe at petroleum fueling facilities in conjunction with Electric Vehicle charging stations or any other non-intrinsically safe electrical equipment. There is already enough dangerous potential, even with the parameters in place in the NFPA 30A draft with Chapter 15.

We all know accidents at petroleum facilities happen, like they do everywhere...

Not if... but when!

Human error and mechanical failures will always happen, causing accidents. NFPA is intended prevent these types of events. Sadly, some accidents are often deadly. From those deadly accidents, we learn and often Industry Standard Codes get amended, in order to provide better safety procedures to prevent future, similar catastrophic events.

Looking ahead without deadly accidents on the books, the 30A committee acted proactively, because members could easily see the additional catastrophic potential mixing Electric Vehicle charging and ignitable fuels in close proximity, at the same facility, leading to Chapter 15 being scribed as you currently read it.

Why would anyone want to remove the newly drafted safeguards which are intended to prevent catastrophic events with loss of life and property? For those lobbying against it... Is the money to be
made from cramming in a few extra charging stations worth the loss of life and property? Is that money to be made worth the life of my family or your family or anyone’s family?

I think NOT!

Without Chapter 15, Electric Vehicle charging stations could be placed in areas where there would not be enough room and too close to areas where flammable vapors could easily be and currently often are, during normal fueling facility operations, especially during fueling mishaps.

Removing the safeguards found in Chapter 15 will allow for more dangerous conditions at petroleum fueling facilities in conjunction with haphazardly installed charging stations leading to higher potential for catastrophic fires and/or explosions when petroleum accidents happen.

Just imagine this real-life movie scene... It is August in the south. Your wife and teenage daughter are sitting in her new Electric Vehicle eating a snack and listening to the radio while the car is charging. They are on the way to your son’s early college graduation. You are so proud he went to summer school to graduate early! Your wife and daughter are in great spirits singing a bad Karaoke rendition of a popular song on the radio. They planned to leave a few minutes ago but the tanker truck has them blocked in.

No worries, the driver said he was sorry the station was not designed with more room... but... he said it would only take a few minutes and he would be out of their way.

As commonly happens during a delivery, the delivery driver is up in the driver’s seat of the cab with the door open entering the start stick reading on his bill of lading, tapping on his iPad, and talking on the cell phone via his Bluetooth earpiece to his girlfriend as he wipes sweat from his face with a dirty rag. This is his 3rd delivery of the day already and he says to her... “Boy... it sure is hot outside... it must be at least a hundred degrees” ... as the sweat from his forehead drips onto the bill of lading.

Now, we all remember, the delivery valves are on the passenger side of the fuel tanker.

At the underground storage tank pad, which is only a few feet up-gradient of the Electric Vehicle charging area, the liquid-tight tank truck drop elbow delivery coupler pops off due to the worn brass camlock style tight-fill adaptor fitting on the underground tank riser due to the force of pressure created by the delivery of 300-400 gallons a minute of Class One Liquid being pulled out of the tanker by gravity.

The delivery driver doesn’t hear the screams from patrons for about 20 seconds over his girlfriend’s voice in his ear telling him to be home by supper time. Once he realizes what has happened, he runs around the front of the truck to close the delivery valve... by then, over 200 gallons of premium gasoline is racing down the hill toward the Electric Vehicle charging station area with no impedance.

The fuel flows under all the vehicles in the charging area, hits the curb, and follows it downhill running under your wife’s car...

This is where the movie changes to slow motion for dramatic effect...

We all know what happens next... the fumes are ignited by an electrical spark from a charging cabinet or an electric motor or hot catalytic converter of a vehicle driving out of the parking lot to escape the impending event or some other source... then... ignition happens...
Your imagination can easily see the outcome of this dramatic scene... but this is NO MOVIE.... Your family doesn’t make it out alive... Do you want to be the cause or be on the receiving end of that phone call? Nobody does!

This is what the NFPA 30A committee is trying to prevent with the parameters of Chapter 15.

A “yes” vote to keep Chapter 15 would have allowed all of us to learn as we go... but in a little safer fashion, about this new “hybrid” fueling station scenario popping up everywhere... and with Chapter 15, NFPA 30A could have better potential to save the lives of families... of that our committee members are certain!

Keeping Chapter 15 could have saved someone’s family... maybe even yours.

Written by John Morgan, NFPA 30A Committee Member
August 18, 2023

Secretary, Standards Council
National Fire Protection Association
One Batterymarch Park
Quincy, MA 02169

RE: APPEAL CAM 101-10
AGENDA ITEM 23-8-11

To Whom It May Concern,

I am submitting this letter as a consultant to the National Trash and Recycling Valet Association (NTRVA) in opposition to the Appeal submitted by Steven Sawyer on CAM 101-10. We offer the following comments in opposition to the Appeal.

1. Additional supporting material submitted in an email from Mr. Sawyer dated July 15, 2023 states that the “cam passed by 2/3 votes at the technical session.” Later in the same email, Mr. Sawyer correctly reports that the vote count was “128 in support, 86 against…” While I recognize that a CAM only needs a simple majority to pass, Mr. Sawyer’s comment that the “cam passed by 2/3 votes” is a misrepresentation of the vote count. The vote count is well short of achieving a 2/3 majority.

2. The Appeal requests the Standards Council to overturn the recommendation of the Technical Committee and to revise the language that was contained in the original Public Comment and CAM 101-10. The Appellant assumes, based upon a single ballot comment, that the RES TC ballot would pass if the language is revised. While the change would apparently change Mr. Burlingame’s ballot, there is no evidence that other ballots, in particular Affirmative ballots, would not change to a Negative ballot. If one reviews the record over the past two revision cycles, one cannot state with any degree of confidence that the ballot results would support the Appeal.

   a. Mr. Carson, Chair of the Safety to Life Correlating Committee, noted in his ballot that the language contained in the Public Comment and CAM did not clearly state that it prohibits valet trash in an unsprinklered building. If it did, is it possible that some Affirmative ballots would become Negative Ballots?

   b. If, during the Public Comment Period, the RES TC agreed with the concept proposed in the Appeal, the RES TC could have created a Second Revision that restricted valet trash service to buildings protected with a sprinkler system. This did not occur. The Committee Statement responding to Public Comment No. 53 contains language indicating that the RES TC clearly recognized the deficiencies with the language proposed in Public Comment No. 53 but chose not to limit valet trash to sprinklered buildings.
“The proposed language does not restrict valet trash in non-sprinklered building only permits valet trash in sprinkler buildings.”

c. The Committee Statement in response to Public Comment No. 113, which proposed to delete the entire section on valet trash, states the following.
“*If there is no language in the code, valet trash is still allowed but there will be no requirements on how it is done.*”

That statement indicates that the RES TC believes that valet trash is permitted by the 2021 Edition of *NFPA 101* in existing buildings, with or without sprinkler protection, even if no language or restrictions are added to the 2024 Edition of *NFPA 101*.

d. The RES TC Ballot on FR-6738, which added the section in question, passed by a vote of 22-2 although in the interest of full disclosure the ballot of Jake Pauls probably should have been shown as a negative. Not a single ballot comment contained a comment that valet trash should be restricted to buildings protected with a sprinkler system.

e. The Committee Statement to SR No. 6588-NFPA 101-2019 (previous revision cycle) indicates that the RES TC added provisions for alternate materials for “containers in sprinklered building or buildings with non-combustible exterior addresses the increased protection in these buildings.” In other words, during that cycle, the RES TC clearly intended to allow valet trash in non-sprinklered existing apartment buildings but imposed container performance requirements that applied only in non-sprinklered existing apartment buildings. The container performance requirements the RES TC added the last cycle are included in the language proposed for the 2024 Edition of *NFPA 101*.

It should be noted that no Informational Ballot or Clarification Ballot was distributed to the RES TC after the Appeal with revised language was submitted. As such, the Standards Council has no way to determine if the language proposed by the Appellant is acceptable to the RES TC.

Lastly, if the Council is inclined to support the Appeal there are other language revisions that should be made. These include:

1. Paragraph 31.7.5.4 relaxes the container performance requirements in buildings protected with a sprinkler system complying with 31.3.5. It would appear as if paragraphs 31.7.5.3 and 31.7.5.4 should also be revised.

2. The language proposed in the Appeal refers to “an approved automatic fire sprinkler system” which is different than the phrase commonly used in Chapter 31. For example, the language shown above from Paragraph 31.7.5.4 uses the language commonly used in Chapter 31 (“buildings protected with a sprinkler system complying with 31.3.5). The difference in language implies that there is a different requirement and would allow any type of fire sprinkler system approved by the Authority Having Jurisdiction.

It should be noted that the Transcript of the NFPA Technical Meeting clearly shows that both of these language flaws were identified and the Appellant has chosen not to propose improved language to address these other flaws.
In summary, over the past two revision cycles the RES TC has clearly supported adding requirements for valet trash in existing apartment buildings, sprinklered or not, to restrict an operation that has been permitted by the 2021 and earlier editions of *NFPA 101* without any restrictions other than not obstructing the egress path.

The NTRVA encourages the Council to deny the Appeal, giving great respect and deference to the NFPA standards development process and lacking any clear and substantial basis for overturning the results of that process.

Respectfully submitted,

[Signature]

William E. Koffel, P.E., FSFPE, SASHE
Senior Director, Special Projects
Licensed in AZ, DC, MD, NY, OH, PA, VA, WA
To Whom it May Concern,

This email is in SUPPORT of proposed TIA 1704 on NFPA 14 regarding lockable hose connection caps.

**Comment on Proposed Language and Technical Substantiation:**
AFSA is in support of the proposed language and substantiation. The proposed text provides much better guidance than Committee Comment No. 89.

**Comment on Emergency Nature:**
Lockable hose connection caps on standpipe systems pose a risk to fire and life safety where they are installed without adequate coordination with the appropriate stakeholders. Unless lockable hose connection caps are required by the fire code official and local fire department, lockable hose connection caps are not permitted and their presence could delay the fire fighting operations of the responding fire department and place the fire fighter, occupants, and building structure at risk. These new requirements are necessary to regulate that risk.
After reading the affected paragraphs I would support both the submitted revisions as well as the TIA.

Michael J Bosma  
President  
Viking SupplyNet  
5150 Beltway Dr. SE  
Caledonia, MI 49316

www.vikinggroupinc.com
I just wish to add my comment of minimizing the inspection requirements as they all come with a high cost and expenses are a significant challenge with an inevitable ripple down effect to the commercial tenants in my building.

Please. Please be always mindful of the consequences of your regulations. We must balance safety with cost. There are risks on both sides of this regulation. Too much is equal a risk as too little. Commonsense approaches, adapting codes to building uses for example...vs. one size fits all.

Let’s not create expenses whenever possible.

sharon gutwin
Foran, Rosanne

From: Jeff Gross
Sent: Friday, March 3, 2023 11:29 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

The revision clarifies the intent for selective coordination to be applied for replacement and modifications for all emergency systems. I support this TIA.

Jeff Gross

Sent from Mail for Windows
I support TIA on Log 1692. This TIA is necessary because of an error by NFPA Staff that was not caught by CMP 13. This TIA fixes a serious, significant error that could endanger lives if not rectified.
Foran, Rosanne

From: eddie guidry
Sent: Saturday, March 4, 2023 1:06 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

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.

I support this TIA.

Eddie

Paul E. Guidry | 5442 Austin Bend Lane, Fulshear, TX 77441

Foran, Rosanne

From: eddie guidry
Sent: Thursday, March 9, 2023 10:14 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1692 on NFPA 70

I support this TIA as the submitter’s substantiation is correct.

Eddie

Eddie Guidry | 5442 Austin Bend Lane, Fulshear, TX 77441
700.32(C) Modifications. If modifications, additions, or deletions to the emergency system(s) occur, selective coordination of the emergency system(s) OCPDs with all supply-side and load-side OCPDs shall be reevaluated.

For a new construction, I do support the TIA 1692. For existing construction, it is not clear what constitutes modification? For old installations, providing selectively coordinated solution can be very costly and may require complete replacement of Upstream and downstream SWBDs and their breakers. Because of such big impact, many owners may decide to postpone immediate retrofits that they would normally conduct.

Same concern applies to 701.32 and 708.

Regards,

Vigen Ghazarian, PE
Principal

From: Foran, Rosanne <rforan@NFPA.org>
Sent: Monday, March 13, 2023 1:12 PM
To: Vigen Ghazarian <
Subject: RE: Comment on Proposed TIA 1692 on NFPA 70

Mr. Ghazarian,

This will acknowledge receipt of your comment on the subject TIA.

Do you support or oppose TIA No. 1692?
Thank you.
Rosanne

Regards,

Rosanne Foran
Standards Operations Coordinator | NFPA
1 Batterymarch Park
Quincy, MA 02169-7471
www.nfpa.org

Learn more about NFPA LiNK™, your custom, on-demand code knowledge tool brought to you by NFPA.
Couple of notes/suggestions:
One: There is not discussion for multiple generators paralleled to a single bus.
For example:
Case-1: Data Center
3 x 1250kW generators each with 2000A breakers.
The bus is feeding 2x2500A ATS for redundant UPS system.
Suggest to leave burden to EOR to ensure that summation of line side OCPD breakers will behave as one. Or
start the study from paralleling gear bus output.

Case-2: Hospital
3 x 1250kW generators each with 2000A breakers.
The bus is feeding life safety, critical and equipment branches.
Equipment branch has a 2000A chiller.

Two: looking to the NEC single lines, it is not clear what series mean.
For non-series example suggest to show more than one OCPD. For example F1 and F2.
For series example show just F.

Thanks,

Vigen Ghazarian, PE
Principal

iFactor
El Segundo | Orange | Tampa

w iFactor.com
Support

**Richard Litland** | Director, Field Team, OMS
Orion Energy Systems, Inc.
http://www.orionlighting.com

**Comment No. 5**

**SUPPORT**

DISCLAIMER: The preceding email message may contain confidential information. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message.
I support the change in 110.14. The use of copper clad aluminum is not prevalent in my area as yet, however the intermixing of copper clad aluminum and aluminum without approved compounds will lead to termination issues.

Jeff Gross

Sent from Mail for Windows
While an impressive amount of scientific data was presented, and the proposed text in the TIA is correct, it isn’t needed and certainly not of an emergency nature.

I do not support this TIA.

Eddie
Eddie Guidry
I oppose this T.I.A. on a number of grounds. Most of them have to do with not the electrical but the mechanical properties of aluminum. This is true even though I read the reports showing that a 14 AWG copperweld (TM) conductor could support a gently-applied 20 lb weight without failing, and with only modest elongation.

One of the concerns raised in the substantiation is that a careless reading (my term) could convince an electrician falsely that splicing copper-clad to copper will create a galvanic cell; because of this misunderstanding, an unsuitable connection will be made and it will deteriorate more quickly than would result ordinarily from the passage of time. Unfortunately, if we concern ourselves with inattentive installers, we may have to look at what happens when they ring conductors in the course of stripping the insulation. They shouldn't but they do. Given this unfortunate characteristic of installers and installations that Mr. Graser set forth as part of his argument, the effect of nicking copperclad also ought to be taken into account. It is more serious than the same nicking or ringing copper conductors, with copperclad only requiring copper for the outer 3.5% of the conductor's radius. I can't see calling the lack of examples an emergency through the "misunderstanding" argument.

Another reason not to accept the TIA is that it does not seek simply to restore the language of the 2020 NEC, but also to add. Saying copperclad conductors are not dissimilar metallurgically from copper conductors certainly is accurate in one sense. The test of conductors suspended in a solution was one demonstration of this. The test of conductors in twist-on connectors was another. Unfortunately, I'm not clear that either provides enough information about field application for such a general statement. First, I don't know that any of the test samples were pretwisted before the twist-on connectors were applied, as is quite common in professional installations. (I could easily have overlooked this.) More important, though, 110.14 does not speak solely of twist-on connectors, nor do the examples that the TIA seeks to add speak solely of 14, 12, and 10 AWG conductors. I don't know what happens when a copperclad and a copper conductor are inserted into side-by-side pressure-plate entries in a wiring device. One screw is tightening the plate, as in the substantiation's Terminal Temperature Test, 4.2, test 3a (where I believe only one conductor material was used for both conductors, as on Page F4, Photo 8). Do both conductors maintain adequate contact over time, or is copper harder enough than the aluminum alloy forming the bulk of the other conductor that it will bear most of the tightening force. A possible consequence f this might be that the copperclad makes poorer contact and loosens over time due to temperature changes. This is about the behavior of the bulk of the conductor, not just its surface.

I do expect that intact copper and copperclad, side by side, will not form a galvanic cell. To extend from that to say that all connectors suitable for use with copper are suitable for use with copperclad is too much. We don't have the data, and even if the submitter's intent is to assure the industry about the safety of three of that company's products, this language is too broad. Example: Burnry's KS90 split-bolt connector is rated for copper and copperclad, 12-10 AWG main, with a wider range for copper taps than for copperweld. Explicitly. It is reasonable to speculate that if it were suitable for use with a 12 AWG copperweld tap, it would be, unless they feared installers would ignore overcurrent protection requirements. I don't know whether that's true. The Ilsco IK10 through IK6 split bolts, unlike their larger split bolts, omit recommendations for use with copperclad. With the proposed wording, 100.14 would say any connector suitable for use with a certain size range of copper conductors would be suitable for that range of copperclad, whether or not it had been tested for this. I have no idea whether this was the intention, but it is what the wording suggests.
Foran, Rosanne

From: david shapiro
Sent: Thursday, March 9, 2023 4:11 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1699 on NFPA 70

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.

I agree with the observation and need for correction, but disagree with the need for a T.I.A. This seems more appropriately treated as an erratum, in that "(B)(3)" should have been printed as "(B)(1)." I do not believe that doing so would be considered a substantive change, and thus beyond what is permissible for an erratum. If I am incorrect here, it's a shame--and if that's the case I do support the need to accept this T.I.A.

(I am not responding in this way to make anybody's life more difficult.)

David Shapiro
Additional language from 110.21(B)(2) should be added to this revision to require the field marking to be permanent and not hand written.

408.6 Short-Circuit Current Rating. Switchboards, switchgear, and panelboards shall have a short circuit current rating not less than the available fault current. In other than one- and two-family dwelling units, the available fault current and the date the calculation was performed shall be field marked on the enclosure at the point of supply. The marking shall be of sufficient durability to withstand the environment involved. The marking shall be permanently affixed to the equipment and shall not be handwritten.

Otherwise I support the addition of the fault calculation and date to be applied to the equipment.

Jeff Gross

Sent from Mail for Windows
I support this TIA as the submitter’s substantiation is valid.

Eddie

Eddie Guidry | 5442 Austin Bend Lane, Fulshear, TX 77441

This substantiation is correct. I support the TIA.

Eddie

Eddie Guidry | 5442 Austin Bend Lane, Fulshear, TX 77441
Comment No. 4
SUPPORT

Support

Richard Litland | Director, Field Team, OMS
Orion Energy Systems, Inc.
http://www.orionlighting.com

DISCLAIMER: The preceding email message may contain confidential information. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message.
Foran, Rosanne

From: Eddie Guidry  
Sent: Friday, June 9, 2023 7:48 PM  
To: Shared TIAs  
Subject: Comment on Proposed TIA 1731 on NFPA 70

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.

I am speaking against approving the proposed TIA for the following reasons:

1. None of the proposed edits correct something that is of an emergency nature. They are editorial only. So, the substantiation used is incorrect and therefore not in compliance with NFPA regs.
2. Wire manufacturer’s instructions include minimum bending radii for different cables. So, this is already covered by 110.3(B). Other individual articles for cables also cover this requirement. If the submitter wants to submit a new PI for 2026, then it should be considered by the public and the CMP at that time.

Eddie

NFPA Member 130214

Eddie Guidry | 5442 Austin Bend Lane, Fulshear, TX 77441
Having read the original wording section 400.47 several times, I agree with the language revision but I don’t agree that it should be considered as a TIA for this cycle. This revision should be part of the input for the 2026 edition of the NEC.

Thank you,

William Gross
Sent from Mail for Windows
I fully support the proposed TIA. From my 30+ years of working in the healthcare industry, mainly working as regulator, I have seen plenty of instances where nursing homes had patients (residents) who were on ventilators and where hospital patient rooms were used to serve patients that would be Category 1 on a risk assessment.

Christopher M. Romano, MS, NYSCEO
Facilities and Regulatory Compliance Director
Project Management Office
SUNY Stony Brook Medicine
Health Sciences Center –Room L1-093C
Stony Brook, NY 11794-8019

CEO- Code Enforcement Official- New York State
NFPA certified Fire Inspector 1
CMS trained Health Care surveyor

“For a brief time I was here, and for a brief time, I mattered” –Harlan Ellison

SBUMC fosters and supports an environment of respect, where every employee has an equal voice and we encourage our staff to have the confidence to speak up out of concern for patient safety without fear of being reprimanded.
I oppose TIA 1696.
The removal of all examples of category spaces makes it difficult for new readers to grasp this concept. It is getting more difficult to describe Category 2 examples as they seem to get pushed up to 1 or down to 3.

We have med gas installers trying to make sense of this code. I see no harm in keeping the historical descriptions in the annex with the disclaimer that these examples could include such spaces as ...

It may be helpful to remove dental offices as they have their own category definitions in chapter 15.

Nursing homes could also be removed for the reasons provided by the Fundamentals committee members.

Corky Bishop
Apex Medical Gas Systems
Comment No. 1

OPPOSE

Comments on proposed TIA 1722 and 1723

The proposed TIA seeks to permit the use of Medical Surgical vacuum systems for limited Plume Evacuation applications and when this is done, to ensure that appropriate filtration is provided for these systems.

Understanding the need for this essential occupational safety facility, I am in sympathy with the intent. However, there are three serious objections to this practice:

1. Centrally piped vacuum systems are not sized with this application in mind. This is not because they cannot achieve the required result, but because it is in economic to operate a pump to do a job that is far better suited to a fan or blower. Plume evacuation capture devices need high flow but beyond what is needed to achieve that, they are otherwise largely indifferent to vacuum level. Medical vacuum is sensitive to vacuum level, is used and designed for far lower flow rates. The high flow into a medical vacuum inlet needed for Plume evacuation is very likely to reduce the vacuum available to other terminals, very possibly compromising the vacuum level available for surgical applications in that room at least.

While as an temporary measure, use of a medical vacuum terminal for plume evacuation is possible, it would be bad practice to make the medical vacuum a facility’s primary plume evacuation resource.

2. It is problematic to draw Plume into the pipeline, as the pipeline is designed and built assuming the system is dry and relatively clean. Plume can leave accumulations in the pipeline at elbows, tees etc. which may over time reduce the pipe Internal diameter. For this reason, it is better practice to filter at the inlet, and prevent the Plume from entering the pipeline at all.

3. The filtration subsystem required for the solution as proposed would need to be sized for the entire flow of the vacuum system. This will mean that the HEPA filtration now provided to reduce emissions from the vacuum exhaust will need to be replaced with a equal number of and potentially larger ULPA filters and activated carbon canisters. Where Plume may be a small fraction of the whole inflow to the system, this would be an undesirable cost for equipment and for maintenance.

This section (5.1.3.7.4) deals with the filters at the central supply system, and therefore does not prevent the smoke from entering the piping. This proposed filtration requirement belongs with the terminal inlet where it will prevent this.

I propose instead:
Leave 5.1.3.7.4 unchanged.

1. Revise 9.3.8 and 9.3.8.1 to read as follows:
9.3.8 Medical Plume (Surgical Smoke) Evacuation and Filtration.

9.3.8.1* Medical plumes (i.e., surgical smoke) generated by the use of energy devices (e.g., electrosurgical units, lasers) during medical and surgical procedures shall be captured as close as possible to the point of generation (i.e. point where the energy device contacts the tissue) by one or a combination of the following methods:

1) Dedicated local exhaust ventilation system that discharges in accordance with 9.3.8.2.

2) Connection and to return or exhaust duct after air cleaning through ULPA and gas phase filtration (e.g., activated carbon).

3) Point of use surgical smoke evacuator with ULPA and gas phase filtration (e.g., activated carbon) for air cleaning and return to the space.

4) Disposal into the centrally piped Medical-surgical vacuum or WAGD systems may be only be used as a temporary expedient provided the gas entering the inlet is first passed through a filtration subsystem including an ULPA filter and gas phase filtration (e.g., activated carbon).

(Note that a definition of an ULPA filter may need to be added)

Add also Annex A 9.3.8.(4)

*A-9.3.8 (4) Centrally piped vacuum systems are not sized with this application in mind. This is not because they cannot achieve the required results, but because it is uneconomic to operate a pump to do a job that is far better suited to a fan or blower. Plume evacuation capture devices need high flow but beyond what is needed to achieve that, they are otherwise largely indifferent to vacuum level. By contrast, Medical vacuum is sensitive to vacuum level and is used and designed for far lower flow rates. Even on a temporary basis, the high flow into a medical vacuum inlet needed for Plume evacuation is very likely to reduce the vacuum available to other terminals, very possibly compromising the vacuum level available for surgical applications in that room at least.

The suitability of a WAGD piping system will vary with the type of system in use. They should be considered suitable only if designed originally to include this use. Otherwise, all the same disqualifications will apply to them as apply to the medical-surgical vacuum.

It is problematic to draw Plume into a vacuum or WAGD pipeline as the pipeline is designed and built under the assumption that the system remains dry and the gas relatively clean. Plume can leave accumulations in the pipeline at elbows, tees, etc. which may over time reduce Internal diameter of the the pipe. For this reason, it is necessary to filter at the inlet, and prevent the Plume from entering the pipeline at all.

While as an temporary measure, use of a medical vacuum or WAGD terminal for plume evacuation is possible, it would be bad practice to make the these a facility’s primary plume evacuation resource.
Comment No. 1

OPPOSE

Comments on proposed TIA 1722 and 1723

The proposed TIA seeks to permit the use of Medical Surgical vacuum systems for limited Plume Evacuation applications and when this is done, to ensure that appropriate filtration is provided for these systems.

Understanding the need for this essential occupational safety facility, I am in sympathy with the intent. However, there are three serious objections to this practice:

1. Centrally piped vacuum systems are not sized with this application in mind. This is not because they cannot achieve the required result, but because it is ineconomic to operate a pump to do a job that is far better suited to a fan or blower. Plume evacuation capture devices need high flow but beyond what is needed to achieve that, they are otherwise largely indifferent to vacuum level. Medical vacuum is sensitive to vacuum level, is used and designed for far lower flow rates. The high flow into a medical vacuum inlet needed for Plume evacuation is very likely to reduce the vacuum available to other terminals, very possibly compromising the vacuum level available for surgical applications in that room at least.

   While as an temporary measure, use of a medical vacuum terminal for plume evacuation is possible, it would be bad practice to make the medical vacuum a facility’s primary plume evacuation resource.

2. It is problematic to draw Plume into the pipeline, as the pipeline is designed and built assuming the system is dry and relatively clean. Plume can leave accumulations in the pipeline at elbows, tees etc. which may over time reduce the pipe Internal diameter. For this reason, it is better practice to filter at the inlet, and prevent the Plume from entering the pipeline at all.

3. The filtration subsystem required for the solution as proposed would need to be sized for the entire flow of the vacuum system. This will mean that the HEPA filtration now provided to reduce emissions from the vacuum exhaust will need to be replaced with a equal number of and potentially larger ULPA filters and activated carbon canisters. Where Plume may be a small fraction of the whole inflow to the system, this would be an undesirable cost for equipment and for maintenance.

This section (5.1.3.7.4) deals with the filters at the central supply system, and therefore does not prevent the smoke from entering the piping. This proposed filtration requirement belongs with the terminal inlet where it will prevent this.

I propose instead:
Leave 5.1.3.7.4 unchanged.

1. Revise 9.3.8 and 9.3.8.1 to read as follows:
9.3.8 Medical Plume (Surgical Smoke) Evacuation and Filtration.
9.3.8.1* Medical plumes (i.e., surgical smoke) generated by the use of energy devices (e.g.,
electrosurgical units, lasers) during medical and surgical procedures shall be captured as close as
possible to the point of generation (i.e. point where the energy device contacts the tissue) by one or a
combination of the following methods:

(1)* Dedicated local exhaust ventilation system that discharges in accordance with 9.3.8.2.

(2) Connection and to return or exhaust duct after air cleaning through ULPA and gas phase filtration
(e.g., activated carbon).

(3) Point of use surgical smoke evacuator with ULPA and gas phase filtration (e.g., activated carbon)
for air cleaning and return to the space.

(4) * Disposal into the centrally piped Medical-surgical vacuum or WAGD systems may be only be used
as a temporary expedient provided the gas entering the inlet is first passed through a filtration
subsystem including an ULPA filter and gas phase filtration (e.g., activated carbon).

(Note that a definition of an ULPA filter may need to be added)

Add also Annex A 9.3.8.(4)
*A-9.3.8 (4) Centrally piped vacuum systems are not sized with this application in mind. This is not
because they cannot achieve the required results, but because it is uneconomic to operate a pump to
do a job that is far better suited to a fan or blower. Plume evacuation capture devices need high flow
but beyond what is needed to achieve that, they are otherwise largely indifferent to vacuum level. By
contrast, Medical vacuum is sensitive to vacuum level and is used and designed at far lower flow
rates. Even on a temporary basis, the high flow into a medical vacuum inlet needed for Plume
evacuation is very likely to reduce the vacuum available to other terminals, very possibly
compromising the vacuum level available for surgical applications in that room at least.

The suitability of a WAGD piping system will vary with the type of system in use. They should be
considered suitable only if designed originally to include this use. Otherwise, all the same
disqualifications will apply to them as apply to the medical-surgical vacuum.

It is problematic to draw Plume into a vacuum or WAGD pipeline as the pipeline is designed and built
under the assumption that the system remains dry and the gas relatively clean. Plume can leave
accumulations in the pipeline at elbows, tees, etc. which may over time reduce Internal diameter of the
the pipe. For this reason, it is necessary to filter at the inlet, and prevent the Plume from entering the
pipeline at all.

While as an temporary measure, use of a medical vacuum or WAGD terminal for plume evacuation is
possible, it would be bad practice to make the these a facility's primary plume evacuation resource.
August 14, 2023

Standards Council
National Fire Protection Association
1 Batterymarch Park
Quincy MA 02169-7471

RE: Submission Pursuant to NFPA Regulation 1.6.4 on TIA #1733 and New Standard at Section 211 9.7.10

Dear Members of the Standard Council:

I am writing you pursuant to NFPA Regulation 1.6.4 about pending TIA #1733 and the new standard adopted by the Section 211 Committee as set forth at Section 9.7.10.

Background Information

My 95-year old mother died at her home in northern New Hampshire in 2016 when her oil-fired, forced hot-water boiler malfunctioned causing a delayed ignition event. As a result of the delayed ignition and resulting explosive event, one end of the vent connector pipe on her boiler was blown off of the flue collar on the boiler. This caused the entire vent connector to become detached from the boiler and the chimney which served the boiler and fall to the floor of the basement in her home. The boiler continued to run after the vent connector collapsed emitting carbon monoxide and other toxic gases into her home. My mother went down into the basement, apparently to investigate what happened, and was asphyxiated by the carbon monoxide which had pooled within the foundation of her basement.

My mother had employed what she thought was a reputable company to inspect and service her boiler annually for at least 6 years prior to the delayed ignition event. However, the service tech who performed those annual inspections did not use screws or other fasteners to fasten the separate sections of the connector
pipe together. Nor did he use screws, rivets, banding, strapping or any other form of mechanical fastening to attach the connector pipe to the flue collar on the boiler even though her boiler was a side-mount or rear-mount where the flue collar was located on the side or back, and not on top, of the boiler. Instead, the service tech used a so-called “friction-fit” or “slip-fit” to join the end of the connector pipe to the flue collar on the boiler. Effectively, the service tech simply stuck one end of the connector pipe onto the flue collar. The slip-fit used to connect the pipe to the flue collar on my mother’s boiler was the weak link in the venting system, and was in my view the clear cause of the vent system collapsing when the delayed ignition event occurred. Had the vent pipe been connected to the flue collar on her boiler via screws or the like, it is my belief the vent system would have remained intact, and my mom would have survived the delayed ignition event.

Based on my review of NFPA codes following my mother’s death, it appeared to me that the NFPA Section 211 and 31 codes were ambiguous or insufficient as to the required manner of attaching the connector pipe to the flue collar on an oil-fired heating devices - and with respect to heating devices in general. I therefore submitted a public comment to the NFPA Section 211 Technical Committee requesting that Section 211 be modified to require mechanical fastening of the connector pipe to the flue collar. My public comment argued that the use of slip-fits or friction-fits to join the connector pipe to the collar should NEVER be permitted. On or about November 2, 2022, the NFPA Section 211 Technical Committee issued final ballot results adopting a new standard which appears at Section 211 9.7.10. The final ballot vote by the Section 211 Committee was unanimous. The new standard at Section 211 9.7.10 provides that “[c]onnectors shall be fastened to appliances using sheet metal screws, rivets, banding, strapping, or other approved means.” The NITMAM and TIA filing periods with respect to challenging the new standard at Section 211 9.7.10 have both expired, and no NITMAMS or TIAs were filed challenging the new standard adopted at Section 211 9.7.10 to my understanding.

I also submitted a public comment to the NFPA Section 31 committee asking them to extract and adopt into Section 31 the new standard adopted at Section 211 9.7.10. The Section 31 Committee also voted unanimously via ballot to adopt and
extract the new standard at Section 211 9.7.10. It is my understanding that the NITMA and TIA appeal periods for Section 31 will not expire until end of 2023. Finally, it is my understanding that a TIA (TIA #1733) has been filed regarding certain changes made to Section 211 during this past revision cycle. However, TIA #1733 does not relate to or seek to challenge the new standard adopted at Section 211 9.7.10 relating to mechanical fastening of the connector pipe to the flue collar.

Regulation 1.6.4 Information

1. My name is Gary A. Braun. I live at 8 Monza Road, Nashua NH 03064. I am not affiliated with any company or organization. I am providing this submission as a private party and citizen.
2. This submission relates to TIA #1733. I do not have a substantive position regarding TIA #1733 either in support of or in opposition to that TIA.
3. Rather, I am making this submission to urge the Standards Council not to delay publication and final adoption of the new standard at Section 211 9.7.10 requiring use of a mechanical fastening system because TIA #1733 is currently pending adjudication before the Council.
4. Instead, the Council should publish and adopt with finality the new standard at Section 211 9.7.10 without further delay at the Council’s upcoming meeting which begins on August 23, 2023.
5. Until such time as the new standard at Section 211 9.7.10 is published and adopted with finality by NFPA, people will remain at risk of serious injury or death due to the failure to mechanically fasten the vent connector pipe to the flue collar on heating appliances. Putting off the publication of the new standard at Section 211 9.7.10 is unnecessary in my view in order for the Council to adjudicate TIA #1733. No one else should die in the manner my mother died. Until the new standard at Section 211 9.7.10 is published and implemented, the risk of someone else dying as she did remains a very real possibility.

Thank you for your consideration.

s/ Gary Braun
(603) 321-1296
I OPPOSE this TIA. Specifically the proposed section 15.13.1.2. The battery charging system should be UL 1012, UL 1741, or CAN/CSA C22.2 No. 107.2. Most residential storage systems use a UL 1741 listed inverter/charger, omitting this from the standard would be a significant error.

Thank you for the consideration.

Rob Rallo
Solar System Services, LLC

[www.solarsystemservices.net]
Rosanne,

If they can modify the TIA to include UL 1741 in section 15.13.1.2 as I have referenced below, then I am in favor. If not, as the TIA is written I am against, as it really doesn't resolve the issue and adds a lot of unnecessary text.

Thank you,

Rob Rallo
Solar System Services, LLC

---

Mr. Rallo,
This will acknowledge receipt of your comment on Proposed TIA No. 1727 to NFPA 855. At the end of the Public Comment period, July 6, 2023, it will be forwarded to the Technical Committee on Energy Storage Systems for review and then to the NFPA Standards Council for consideration.

And also, are you supporting this TIA with comment? Or totally opposing the TIA?
Thank you.
~Rosanne

Regards,

Rosanne Foran
Standards Operations Coordinator | NFPA
1 Batterymarch Park
Quincy, MA 02169-7471
www.nfpa.org
From:       
Sent: Tuesday, June 13, 2023 4:32 PM  
To: Shared TIAs <STIAs@nfpa.org>  
Subject: Comment on Proposed TIA 1727 on NFPA 855

**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.

I wanted to comment on TIA 1727.

UL 1741 should have been included in section 15.13.1.2

15.13.1.2 Lead-acid and nickel-cadmium batteries used in standby power systems and listed to UL 1973 shall not require UL 9540A testing when installed with a charging system listed to UL 1012, UL 1741, UL 60950-1, or UL 62368-1, or a UPS listed to UL 1778.

**Reason:** Most residential systems use a UL 1741 listed inverter/charger and not including this in the listing is a critical omission.

Thank you,

Rob Rallo  
Solar System Services, LLC
I am in agreement with the proposed TIA 1727.

However, we used UL to perform the UL 9540A test on our new Lithium-ion (LTO) ESS. Our name brand for the product is “Toshiba SCiB ESS”. A test method of adding heat pads to the SCiB battery cells was done because other types of tests could not induce thermal runaway. Adding heat pads was the only method to induce thermal runaway. The product is not capable of thermal runaway under normal applications and the heat pads are not part of the product. The test performed was essentially putting the SCiB ESS in a fire caused externally to the product. The test did not include any of the fire mitigation/fire suppression methods stated in the NEC 855 i.e. 4.9.2 Sprinkler System, 9.5.3.1.4 Fire Suppression and Control, Annex C.3 Suppression Systems and other such references which may have prevented the ESS from thermal propagation.

The UL 9540A report generated has elements that indicate pass / fail when it is our understanding and per 15.12 of the proposed TIA the UL 9540 test is for gathering data for the AHJ to determine the safest installation practice. A.15.13.1 A UL 9540A or equivalent test should evaluate the fire characteristics of the composition of gases generated at the cell, module, and unit and installation levels for ESS undergoing thermal runaways, such as what might occur due to a fault, physical damage, or exposure hazard. The evaluation of the fire characteristics during fire vent testing at the unit level and installation-level testing should document whether the fire event propagates to the neighboring ESS units and include radiant heat flux measurements at enclosing wall surfaces and at various distances from the ESS being tested at the unit level. The fire and explosion testing data is intended to be used by manufacturers, system designers, and AHJs to determine if the required separation distance for an ESS installation can be reduced.

The National Fire Protection Agency 855 Code as a standard for the installation of energy storage systems is crucial for ensuring proper handling of energy storage systems and mitigating potential fire hazards. In the UL9540A Test, there is a huge deviation of generating thermal runaway due to overcharge, short circuit, or puncture testing when contrasted with installing heating pads inside of our modules on multiple cells to induce thermal runaway.

Lithium-Ion has undergone a huge amount of scrutiny because of its susceptibility to causing fires without any notice. Internal shorts in the battery due to dendrite formation are the leading cause of those lithium-ion fires. A puncture test is the best representation of an internal short (dendrite) in the battery. The resulting thermal runaway observed from such puncture test would show the AHJ what would occur if dendrite growth caused a Lithium battery cell short. From the data gathered, the AHJ would make spacing restrictions and fire suppression requirements for the product per the UL9540A test data.

The Toshiba SCiB ESS (LTO) Chemistry when undergoing an internal short puncture test, did not result in a fire nor induce thermal runaway. When looking at a heating pad method for inducing thermal runaway, the purpose would be to replicate the environment of the cabinet reaching a sufficient temperature to induce thermal runaway. Such incident would be a result of no building or room fire mitigation systems installed, or a failure of such fire mitigation system(s).
While this is an important scenario to prepare for, we are concerned that AHJs and Customers will read the test report and focus on the Pass / Fail and not the methods of inducing thermal runaway, which in our opinion would be external to the SCiB ESS cabinets and controllable by standard fire suppression methods for electrical equipment and other ESS technologies such as VRLA batteries.

The UL report should not indicate pass/fail, nor should it dictate ‘Necessity for Installation Level Test’. The report should only provide data on the test so the AHJ (or fire expert) can determine the safest installation practice based on the UL 9540A test data gathered. Any connotation of pass/fail should not be included in the report.

Here are some examples of the concern:

```
Necessity for an Installation level test

[X] The performance criteria of the unit level test as indicated in Table 9.1 of UL 9540A 4th edition has not been met, therefore an installation level testing in accordance with UL 9540A will need to be conducted on the representative the installation with this unit installed.

[ ] The performance criteria of the unit level tests as indicated in Table 9.1 of UL 9540A 4th edition has been met, therefore an installation level testing in accordance with UL 9540A need not be conducted.
```
This may not be an NFPA 855 issue but rather a third-party (UL) issue on the interpretation of the requirements. However, the NFPA 855 should specifically state the UL 9540 test is for gathering data only and not for pass-fail purposes. That determination, as stated in the TIA, is the responsibility of the AHJ or fire experts.
Create together.
Do the right thing.
Look for a better way.
Always consider the impact.

Steven Unger
Associate Director Product Management
Power Electronics Division
9 Toshiba International Corporation
13131 West Little York Rd. Houston, TX 77041
Rosanne/Paige,

FYI. Please note the formal appeal from Summit International on TIA No. 1732 is copied below.

Dawn Michele was copied on the original email response as directed by Suzanne Gallagher.

Thank you.

Matt Barker
Senior Chemical Engineer | NFPA
1 Batterymarch Park
Quincy, MA 02169-7471
+ www.nfpa.org

---

Rosanne/Paige,

FYI. Please note the formal appeal from Summit International on TIA No. 1732 is copied below.

Dawn Michele was copied on the original email response as directed by Suzanne Gallagher.

Thank you.

Matt Barker
Senior Chemical Engineer | NFPA
1 Batterymarch Park
Quincy, MA 02169-7471
+ www.nfpa.org

---

Dear Sheida,

I received your appeal and am sending it to Dawn Michele Bellis by copy of this email. Dawn Michele is the Standards Council Secretary, and under the Regulations Governing the Development of NFPA Standards, Section 1.6.1, appeals to the Standards Council must be filed with Dawn Michele. She is on vacation and returning next week, so you can likely expect to hear from her after she returns and has a chance to review.

Respectfully,

Matt Barker
Good morning Matt,

This an official request to appeal NFPA 2112 Proposed TIA No. 1732 voted on June 5, 2023 by the Technical Committee on Flash Fire Protective Garments which removes the language that prevents the use of uncovered venting material on flame-resistant garments.

Our company, Summit International/Summit Work Apparel (“Summit”) has been manufacturing a UL Certified vented coverall and a UL Certified vented shirt for over a decade based on our design and utility patent (Patent Number #US 9,717,291 B2 – Patented 2017) that is constructed with a covered back FR venting material (FR mesh) and an uncovered underarm FR venting material (FR mesh) with the same FR mesh. The uncovered venting material area for our garment(s) do not exceed 36 in² over the entire flame-resistant coverall or shirt.

Summit is the inventor of FR vented coverall and shirt. Our vented garments made with this vented patented technology have been trademarked as Summit Breeze® and have been independently tested for flash fire by several world-renowned testing facilities. We proudly display our burn test results on our company website (link provided for your reference: [https://issuu.com/summitinternational/docs/11x17_breeze_burn_westex-carolina_3?e=4683851/7138020](https://issuu.com/summitinternational/docs/11x17_breeze_burn_westex-carolina_3?e=4683851/7138020)) which report that our garments by far exceed the NFPA 2112 performance standards. During the testing at University of Alberta Protective Clothing and Equipment Research Facility Flash Fire Facility, the Summit Breeze® recorded body burn results of only 6.45% to 9.05% with Zero 3rd degree burn (5% of this 6.45-9.05% is related to the exposed head area) leaving only about 1.45% to 4.05% of 2nd degree burn recorded in the entire body area. In another testing facility, Aitex, the Summit Breeze® recorded astonishing body burn results of 4.4% of only 2nd degree burn and zero 3rd degree burn result (except in the exposed head area). It was based on this same concept that Summit was able to obtain a utility and design patent from the US Patent and Trademark Office in USA and Canada.

To our surprise, during our UL recertification process, on July 19, 2023, we were informed by our UL representative, Tony Oh, about this NFPA 2112 Proposed NFPA TIA No. 1732 that would ban the use of uncovered venting material in
flame-resistant garments because of assumptions and substantiations that “materials passing this abbreviated testing protocol are likely not as protective as standard body fabric which could leave a wearer less protected in areas where vents exist” ……”These uncovered fabric panels can be made of a potentially less protective flame resistant fabric…….” “End users select NFPA 2112 compliant garments for protection against flash fire, and in their current design, could leave wearers vulnerable to increased burn injury……” How could NFPA 2112 allow its technical committee to make such a proposal based on unsupported “couds” and “potentials” without researching all the facts and available testing?

We had a conversation with Ms. Amanda Newson of UL LLC who is listed as the “Submitter” of this proposal and explained to her that this proposal was submitted and voted by NFPA committee without physical evidence or facts.

As you can see, the burn test results confirm that not only the vents will not leave wearers less protected, but our garments have one of the lowest burn test results in the industry and will not leave wearers vulnerable to burn injury. These garments are made with protective flame-resistant fabrics, including the venting/mesh fabric.

NFPA 2112 TIA No. 1732 speaks contrary to the facts which are these burn test results and does not have any accuracy and merit behind the votes. NFPA 2112 must take corrective action and address this error in judgement immediately because it is false and harmful. Summit Breeze® garments are the safest garments in the industry and this decision will have a direct and catastrophic financial impact on Summit’s entire business and existence.

We have already submitted an emergency TIA Request Form and due to the nature of the proposed and voted NFPA 2112 TIA No. 1732 which will cease the manufacturing of our patented vented Summit Breeze® garments, this appeal cannot be delayed and must be escalated and resolved before your August 23, 2023, session of the NFPA Standard Counsel meeting. The President & CEO of our company, Mr. Mark Kaviani, and myself are available for an in-person appearance to meet with the NFPA Technical Committee, NFPA Standard Counsel or any other authorized party to appeal and correct this matter promptly.

Please contact us with any questions.

Thank you and awaiting your response.

Kind regards,

Sheida Sabetian
Chief Financial Officer

Like & Follow us: Facebook LinkedIn Twitter Instagram Website: SummitWorkApparel Google
Confidentiality Notice: This transmission may contain information that is privileged, confidential and or exempt from disclosure under applicable law. If you have received this communication in error or are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED BY LAW and shall be subject to prosecution. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format.
Resending the Chair request below.

Get Outlook for iOS

Chris,

Please find the request (below) from the FLG-AAA TC Chair to send TIA No. 1732 back to the committee for further review.

Matt Barker
Senior Chemical Engineer | NFPA
1 Batterymarch Park
Quincy, MA 02169-7471
+ www.nfpa.org

National Fire Protection Association
NFPA began in 1896 and today is recognized as a leader in fire, electrical, building, and life safety.

IT’S A BIG WORLD. LET’S PROTECT IT TOGETHER.®

Important Notice: Any opinion expressed in this correspondence is the personal opinion of the author and does not necessarily represent the official position of the NFPA or its Technical Committees. In addition, this correspondence is neither intended, nor should it be relied upon, to provide professional consultation or services.

Confidentiality: This e-mail (including any attachments) may contain confidential, proprietary or privileged information, and unauthorized disclosure or use is prohibited. If you receive this e-mail in error, please notify the sender and delete this e-mail from your system.
I am standing by if you need additional information.

Respectfully,

Matt Barker  
Senior Chemical Engineer | NFPA  
1 Batterymarch Park  
Quincy, MA 02169-7471  
+ www.nfpa.org

**National Fire Protection Association**  
NFPA began in 1896 and today is recognized as a leader in fire, electrical, building, and life safety.

**IT'S A BIG WORLD. LET'S PROTECT IT TOGETHER.®,**

**Important Notice:** Any opinion expressed in this correspondence is the personal opinion of the author and does not necessarily represent the official position of the NFPA or its Technical Committees. In addition, this correspondence is neither intended, nor should it be relied upon, to provide professional consultation or services.

**Confidentiality:** This e-mail (including any attachments) may contain confidential, proprietary or privileged information, and unauthorized disclosure or use is prohibited. If you receive this e-mail in error, please notify the sender and delete this e-mail from your system.

---

From: Addington, Steven  
Sent: Thursday, August 10, 2023 10:10 AM  
To: Barker, Matthew  
Subject: NFPA TC 2112 - Proposed TIA No. 1732

**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.

Matt – I would like to request the standard council to send this TIA back to the committee for further review. After the committee voting on this TIA was complete an issue was brought to my attention from Summit International. I feel all parties involved would benefit from further discussion from the technical committee and Summit International. Please let me know if you need any additional justification.

**Steven Addington, CSP | Eastman**  
Global HSE Lead, Films