Question: Is the committee’s interpretation that a station, constructed at street level in the center divider with the platform raised approximately 1 meter above grade level, be defined as an elevated station?
Answer: No.
Reference: 8.4.2  
F.I. No.: 130-03-1  

Background: I believe that the intent of 8.4.2 of NFPA 130-2014 is to allow a partial fire hazard analysis to be conducted to replace a material contained in a limited portion of the rail car by an alternate material not meeting the appropriate criteria of Table 8.4.1. I do not believe that the intent of this section was to permit the replacement of a material that meets all of the appropriate criteria of Table 8.4.1 and is widely used throughout the rail car (such as the foam contained within all seats or the material lining the entire ceiling) by an alternate material simply as a result of a partial fire hazard analysis. If such a broad replacement were possible, in view of the limits of precision of a fire hazard analysis, it would be possible that the complete fire hazard analysis would show the replacement material to be significantly less safe. A partial fire hazard analysis could appear to show that two materials have no significant differences in fire hazard simply because the differences found in the partial fire hazard analysis fall within the limits of precision of that analysis. Thus, I believe that the intent of this section was that extensive replacements will still require complete fire hazard analyses. Consequently, I am asking for a formal interpretation of the section.

In other words, is it the intent of the technical committee, for example, for the following sequence of events to be permissible?

1. to find a new seat padding material that does not meet the criteria in Table 8.4.1;
2. to compare its fire properties with those of the seat padding material used throughout the rail car (and that meets the criteria in Table 8.4.1);
3. to conduct a partial fire hazard analysis comparing the materials only (and not a fire hazard analysis on the entire rail car and not even a fire hazard analysis on the entire seat assembly), meaning that a heat release test is conducted, for example;
4. to find that the alternate material produces a contribution to fire hazard that is not much greater than that of material in use;
5. and as a result to replace the existing padding material with the new alternate padding material that does not meet the criteria in Table 8.4.1.

Question: Is it the intent of NFPA 130, 2014 edition, section 8.4.2 to permit the replacement of a material that meets all the appropriate criteria of Table 8.4.1 and is widely used throughout the rail car (such as the foam contained in all seats or the material lining the entire ceiling) by an alternate material that does not meet the appropriate criteria of Table 8.4.1, following a partial fire hazard analysis on the material itself (and not a fire hazard analysis on the entire rail car and not even a fire hazard analysis on an assembly containing the material) that shows that the alternate material produces a contribution to fire hazard only slightly greater than that of the material that meets the criteria of Table 8.4.1?

Answer: No