MEMORANDUM

To: NFPA Technical Committee on Fire Department Apparatus

From: Stacey Van Zandt

Date: August 2, 2011

Subject: NFPA 1911 Proposed Tentative Interim Amendment (TIA) No.1030

The attached proposed Tentative Interim Amendment (TIA) is being submitted to you for letter ballot. This proposed TIA was submitted by Stephen Wilde and endorsed by John McDonald and Tom Hillenbrand.

This proposed TIA will be published for public comment in the August 5, 2011 issue of NFPA News with a Public Comment Closing Date of September 9, 2011. Any public comments received will be circulated to the committee. The Standards Council will consider the issuance of this TIA at their October 17-19, 2011 meeting.

In addition to being balloted on the technical merits of the proposed TIA, the Committee is also being balloted on whether or not this matter is of an emergency nature. Please see Section 5 (copy enclosed) regarding the processing of TIAs from the NFPA Regulations Governing Committee Projects.

Please complete and return your ballot as soon as possible but no later than Friday, August 19, 2011. As noted on the ballot form, please return the ballot to Stacey Van Zandt either via e-mail to svanzandt@nfpa.org or via fax to 617-984-7056. You may also mail your ballot to the attention of Stacey Van Zandt at NFPA, 1 Batterymarch Park, Quincy, MA 02169.

Note: Please remember that the return of ballots and attendance at committee meetings are required in accordance with the NFPA Regulations Governing Committee Projects.

Attachments
Section 5 Tentative Interim Amendments.

5.1 Preliminary Determination of Compliance. A Tentative Interim Amendment (TIA) to any Document may be processed if the Council Secretary determines, after a preliminary review, and consultation with the appropriate Chair, that the Amendment appears to be of an emergency nature requiring prompt action and has the endorsement of at least two Members of the involved TC or TCC. If processed, the question of emergency nature shall be considered by the TC and TCC. The text of a proposed Tentative Interim Amendment may be processed as submitted or may be changed, but only with the approval of the submitter.

5.2 Evaluation of Emergency Nature. Determination of an emergency nature shall include but not be limited to one or more of the following factors:

(a) The document contains an error or an omission that was overlooked during a regular revision process.
(b) The document contains a conflict within the document or with another NFPA document.
(c) The proposed TIA intends to correct a previously unknown existing hazard.
(d) The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation.
(e) The proposed TIA intends to accomplish a recognition of an advance in the art of safeguarding property or life where an alternative method is not in current use or is unavailable to the public.
(f) The proposed TIA intends to correct a circumstance in which the revised document has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process, or was without adequate technical (safety) justification for the action.

5.3 Publication of Proposed Tentative Interim Amendment. A proposed Tentative Interim Amendment that meets the provisions of 5.1 shall be published by the Association in appropriate media with a notice that the proposed Tentative Interim Amendment has been forwarded to the responsible TC and TCC for processing and that anyone interested may comment on the proposed Tentative Interim Amendment within the time period established and published.

5.4 Technical Committee and Technical Correlating Committee Action.

(a) The proposed Tentative Interim Amendment shall be submitted for ballot and comment of the TC in accordance with 3.3.4. The TC shall be separately balloted on both the technical merits of the amendment and whether the amendment involves an issue of an emergency nature. Such balloting shall be completed concurrently with the public review period. Any public comments inconsistent with the vote of any TC Member shall be circulated to the TC to allow votes to be changed. A recommendation for approval shall be established if three-fourths of the voting Members calculated in accordance with 3.3.4.5 have voted in favor of the Tentative Interim Amendment.
(b) The proposed Tentative Interim Amendment shall be submitted for ballot and comment of the TCC, if any, which shall make a recommendation to the Council with respect to the disposition of the Tentative Interim Amendment. The TCC shall be separately balloted on both the merits of the amendment (as it relates to the TCC authority and responsibilities in accordance with 3.4.2 and 3.4.3) and whether the amendment involves an issue of an emergency nature. Any public comments inconsistent with the vote of any TC or TCC Member shall be circulated to the 28 TCC to allow votes to be changed. A recommendation for approval shall be established if three-fourths of the voting Members calculated in accordance with 3.3.4.5 have voted in favor of the Tentative Interim Amendment.

(c) All public comments, ballots, and comments on ballot on the proposed Tentative Interim Amendment shall be summarized in a staff report and forwarded to the Council for action in accordance with 5.5.

5.5 Action of the Council. The Council shall review the material submitted in accordance with 5.4(c), together with the record on any Appeals (see 1.6, 1.6.1), and shall take one of the following actions:

(a) Issue the proposed Tentative Interim Amendment
(b) Issue the proposed Tentative Interim Amendment as amended by the Council
(c) Where acted on concurrently with the issuance of a new edition of the Document to which it relates, issue the Tentative Interim Amendment as part of the new edition;
(d) Reject the proposed Tentative Interim Amendment
(e) Return the proposed Tentative Interim Amendment to the TC with appropriate instruction
(f) Direct a different action

5.6 Effective Date of Amendment. Tentative Interim Amendments shall become effective 20 days after Council issuance unless the President determines, within his or her discretion, that the effective date shall be delayed pending the consideration of a Petition to the Board of Directors (see 1.7). The President may also, within his or her discretion, refer the matter of a delay in the effective date of the TIA to the Executive Committee of the Board of Directors or to the Board of Directors.

5.7 Publication of Amendment. The Association shall publish in one of its publications sent or accessible to all Members notice of the issuance of each Tentative Interim Amendment and may, as appropriate, issue a news release to applicable and interested technical journals. The notice and any news release shall indicate the tentative character of the Tentative Interim Amendment. In any subsequent distribution of the Document to which the Tentative Interim Amendment applies, the text of the Tentative Interim Amendment shall be included in a manner judged most feasible to accomplish the desired objectives.

5.8 Applicability. Tentative Interim Amendments shall apply to the document existing at the time of issuance. Tentative Interim Amendments issued after the proposal closing date shall also apply, where the text of the existing document remains unchanged, to the next edition of the Document. Tentative Interim Amendments issued concurrently with the issuance of a new edition shall apply to both the existing and new edition.

5.9 Subsequent Processing. TC responsible for the Document or part of the Document affected shall process the subject matter of any Tentative Interim Amendment as a proposal for the next edition of the Document (see 3.3).

5.10 Exception. When the Council authorizes other procedures for the processing and/or issuance of Tentative Interim Amendments, the provisions of this Section shall not apply.
Standard for the Inspection, Maintenance, Testing, and Retirement of In-Service Automotive Fire Apparatus

TIA Log No. 1030
Reference: 7.3.3 and 7.3.4
Comment Closing Date: September 9, 2011
Submitter: Stephen Wilde, Certified Fleet Services, Inc.

1. Revise 7.3.3 to read as follows:

7.3.3* Tires shall be inspected for damage, dry rot, and belt separation and shall be inflated to the tire manufacturer's recommended pressure.

2. Revise 7.3.4 to read as follows:

7.3.4 Tires shall be replaced at least every 7 years or more frequently when:
1. A qualified technician determines the need for new tires based on an inspection
2. The tread wear exceeds state or federal standards as determined by measuring with a tread depth gauge. [See 6.3.1(4).]
3. Tires have a tread depth of less than 4/32 in. (3.2 mm) on any steering axle or 2/32 in. (1.6 mm) on any nonsteering axle at any two adjacent major tread grooves anywhere on the tire.

Submitter’s Substantiation: There is no tire industry requirement or tire manufacturer that states a commercial tire can only last 7 years. When tires are inspected, as stated in the revised text above, a chronological tire age is not needed. For example, there is a department in our area that does not make many calls, they have an eight year old engine with less than 10,000 miles. The DOT tire dates are from 2002, which under the current standard would require them to be replaced due to age. The tire tread depth measures 9/64", the tires when new had a thread depth of 11/64". Why should the tires be replaced if they have passed the PM inspection and are only worn 2/64" Not only is this a financial burden, but it also poses an environmental issue with disposal and depletion of natural resources.

Another consideration has to be how long the tires might have been in storage prior to being sold to the customer. We did a PM inspection on a customer’s truck that had tires replaced in 2010, two tires had DOT dates on them from 2008 and the other two were from 2009. Under the current standard this customer’s tires installed in 2010, would have to be replaced in 2015 and 2016. Since the only way to determine tire age is by the DOT date on the side of the tire, the tires would have to changed when they have only been on the vehicle for 5 and 6 years instead of 7 years. The minimum tread depth of 4/32" for steer axles and 2/32" for drive axles, as stated in 7.3.4 (3) and 1911 section 6.3.1(4), is a minimum Federal DOT requirement for commercial tires. Listed in 49CFR393.75--Sec. 393.75 Tires, Subpart G—Miscellaneous Parts and Accessories, 393.75 Tires (b) and (c).

The attached tire life statement by Rubber Manufacturers Association (RMA) explains the reasons that a tire’s chronological age cannot be determined. According to RMA and tire manufacturer’s, the same holds true for commercial tires, even though the attached RMA tire life statement is specific to passenger and light truck tires.

Emergency Nature: The required replacement of tires after 7 years is placing an undue financial burden on departments and agencies trying to comply with the 1911 requirements. The waste of natural resources and the burden of proper disposal or reprocessing of the tire have an effect on the environment. The document is in the process of being reprinted and this change must be included immediately to stop the replacement of good tires that are not defective, but simply beyond a specific age.
STATEMENT OF
RUBBER MANUFACTURERS ASSOCIATION

Tire Service Life for Passenger Car and Light Truck Tires

Tires are designed and built to provide many thousands of miles of excellent service but must be maintained properly. As explained below, the service life of a tire is affected by many factors that are independent of the chronological age of the tire.

Service Life is Not Determined by Chronological Age

Tires are composed of various materials, including rubber, having performance properties essential to the proper functioning of the tire. These component properties evolve over a combination of time, service and storage conditions. For each individual tire, this change is affected by many elements such as temperature, storage conditions, and conditions of use (e.g., load, speed, inflation pressure, impacts and road hazard injury) to which a tire is subjected throughout its life. Since service and storage conditions vary widely, accurately predicting the serviceable life of any specific tire based on simple calendar age is not possible. RMA is not aware of scientific or technical data that establishes or identifies a specific minimum or maximum service life for passenger and light truck tires. However, in some cases a tire or vehicle manufacturer may make a specific tire replacement recommendation regarding its products. If so, the consumer should consult the manufacturer with any questions with regard to following the recommendation. Further, any such recommendation should not be considered a minimum serviceable life for the tire.

The Consumer Plays A Primary Role in Tire Maintenance

The tire industry has long emphasized the consumers’ role in the regular care and maintenance of their tires. (Tire care and service manuals are available from RMA on its website, www.rma.org.) Tires should be removed from service for several reasons, including tread worn down to minimum depth, signs of damage (cuts, cracks, bulges, vibration, etc.) or signs of abuse (underinflation, overloading, etc). That is why it is recommended to have tires, including spares, inspected regularly. A monthly maintenance inspection, for which the consumer must be primarily responsible, should focus on proper inflation pressure, tread wear and tire damage. This monthly inspection should be supplemented by recurring rotation, balancing and alignment services. This inspection should occur whether or not the vehicle is equipped with a tire pressure monitoring system. Additionally, the condition of a tire should be assessed regularly to determine if there are any tactile or visual signs of damage that make replacement necessary.
Storage, Rotation, and Other Conditions That May Affect Tire Service Life

Tires should always be stored in a dry, cool, well-ventilated place. Avoid storing tires in areas that are exposed to wetness, petroleum or petroleum-based products, extreme temperatures, direct sunlight, and/or other sources of ozone, such as electric motors. Storage areas should also be clean and free of grease, gasoline or any corrosive chemicals which can deteriorate the rubber.

If a vehicle is fitted with a matching full-size spare tire (same size and type as other in-service tires) the consumer should follow the vehicle manufacturer’s recommendation for rotating the spare tire. When any spare tire is placed into service, its inflation pressure must be checked immediately.

Consumers are strongly encouraged to be aware not only of their tires’ visual condition but also of any change in dynamic performance such as increased air loss, noise or vibration. Such a change in performance could be an indication of an internal condition that might dictate removing the tires from service immediately to prevent a tire failure. In these cases, RMA recommends that consumers consult a tire service professional.

Adopted March 2006
John McDonald
1901 TC Member

Tom Hillenbrand
1901 TC Member
TECHNICAL COMMITTEE LETTER BALLOT
PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1030
To Revise 7.3.3 and 7.3.4 of the 2007 and Proposed 2012 Editions of NFPA 1911,
Standard for the Inspection, Maintenance, Testing, and Retirement of In-Service Automotive Fire Apparatus

Question 1: I agree with the TECHNICAL MERITS of the Proposed TIA to revise 7.3.3 and 7.3.4.

_______ AGREE ____________ DISAGREE*  ____________ ABSTAIN*

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation must accompany a disagreement or abstaining position.

_____________________________________________________________________

_____________________________________________________________________

Question 2: I agree that the subject is of an EMERGENCY NATURE.

_______ AGREE ____________ DISAGREE*  ____________ ABSTAIN*

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation must accompany a disagreement or abstaining position.

_____________________________________________________________________

_____________________________________________________________________

Signature

Name (Please Print)

Date

Please return the ballot on or before August 19, 2011.

PLEASE RETURN TO:
Stacey Van Zandt, Project Administrator
NFPA
1 Batterymarch Park
Quincy, MA 02169  FAX: (617) 984-7056  E-mail: svanzandt@nfpa.org