Public Comment No. 31-NFPA 10-2015 [Section No. 2.3]

2.3 Other Publications.

2.3.1 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM D5391, *Standard Test for Electrical Conductivity and Resistivity of a Flowing High Purity Water Sample*, 2014.

2.3.2 ACA Publications.

American Coatings Association, 1500 Rhode Island Avenue, NW, Washington, DC 20005.

*Hazardous Materials Identification System (HMIS), Implementational Manual,*Fourth Edition.

2.3.3 CGA Publications.

Compressed Gas Association, 14501 George Carter Way, Suite 103, Chantilly, VA 20151-1788.

CGA C-1, *Methods for Pressure Testing Compressed Gas Cylinders*, 2009.

CGA G-10.1, *Commodity Specification for Nitrogen*, 2008.

2.3.4 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 1093, *Standard for Halogenated Agent Fire Extinguishers*, 1995, Revised 2008. **(Withdrawn)**

UL 1803, *Standard for Factory Follow-Up on Third Party Certified Portable Fire Extinguishers*, 2012.

2.3.5 ULC Publications.

Underwriters' Laboratories of Canada, 7 Underwriters Road, Toronto, Ontario M1R 3A9, Canada.

CAN/ULC-S512, *Standard for Halogenated Agent Hand and Wheeled Fire Extinguishers*, 2005, reaffirmed 2007.

2.3.6 UL/ULC Publications.

The following publications are bi-nationally harmonized standards for Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096, and Underwriters' Laboratories of Canada, 7 Underwriters Road, Toronto, Ontario M1R 3A9, Canada.

ANSI/UL 8, **ULC CAN** ~~/ULC~~ -S554, *Water Based Agent Fire Extinguishers*, 2011.

ANSI/UL 154, **ULC CAN** ~~/ULC~~ -S503, *Standard for Carbon-Dioxide Fire Extinguishers*, 2014.

ANSI/UL 299, **ULC CAN** ~~/ULC~~ -S504, *Standard for Dry Chemical Fire Extinguishers*, 2012.

ANSI/UL 626, **ULC CAN** ~~/ULC~~ -S507, *Standard for Water Fire Extinguishers*, 2012.

ANSI/UL 711, **ULC CAN** ~~/ULC~~ -S508, *Standard for Rating and Fire Testing of Fire Extinguishers*, 2013.

ANSI/UL 2129, **ULC CAN** ~~/ULC~~ -S566, *Standard for Halocarbon Clean Agent Fire Extinguishers*, 2014.

2.3.7 UN Publications.

United Nations, Publications Customer Service, PO Box 960, Herndon, VA 20172.

GHS, *Globally Harmonized System of Classification and Labeling of Chemicals*, ST/SG/AC.10/30/Rev. 6, 2015.

2.3.8 U.S. Government Publications.

U.S. Government ~~Printing~~ **Publishing Office, 732 North Capitol Street, NW, Washington, DC** ~~20402~~ **20401-0001** .

Title 49, Code of Federal Regulations, Part 180.209, “Requirements for Requalification of Specification Cylinders,” 2015.

Title 49, Code of Federal Regulations, Part 180.213, “Requalification Markings,” 2015.

2.3.9 Other Publications.

Merriam-Webster's Collegiate Dictionary, 11th edition, Merriam-Webster, Inc., Springfield, MA, 2003.

Statement of Problem and Substantiation for Public Comment

Referenced current GPO, name, and address.

Related Item

First Revision No. 1-NFPA 10-2015 [Section No. 2.2]

Submitter Information Verification

Submitter Full Name: Aaron Adamczyk
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Tue Sep 29 00:22:56 EDT 2015

Committee Statement

Committee Action: Rejected but see related SR
Resolution:
Statement: Reference updates.

Public Comment No. 56-NFPA 10-2015 [Section No. 6.1.3.10.6]

6.1.3.10.6

Only surface mounted cabinets or fire-rated cabinets shall be installed in ~~1-hour and 2-hour~~ fire-resistance-rated walls.

Statement of Problem and Substantiation for Public Comment

Only surface mounted cabinets or fire-rated cabinets which are specially constructed with gypsum board installed on the sides, top, bottom, and back and are intended to be installed in any fire-resistance-rated walls. Cabinets that are not fire-rated should not be installed in these walls as they would make the entire fire-rated wall non-compliant.

Related Item

First Revision No. 31-NFPA 10-2015 [New Section after 6.1.3.10.5]

Submitter Information Verification

Submitter Full Name: Mark Conroy
Organization: Brooks Equipment Company
Street Address:
City:
State:
Zip:
Submittal Date: Tue Nov 10 14:57:11 EST 2015

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-4-NFPA 10-2016

Statement: Only surface mounted cabinets or listed fire-rated cabinets are intended to be installed in any fire-resistance-rated walls. Cabinets that are not fire-rated should not be installed in these walls as they would make the entire fire-rated wall non-compliant.

Public Comment No. 6-NFPA 10-2015 [Section No. 7.2.1.2 [Excluding any Sub-Sections]]

Fire extinguishers and Class D extinguishing agents shall be inspected either manually or by means of an electronic monitoring device/system at intervals not exceeding 31 days.

Replace existing text with:

Fire extinguishers and Class D extinguishing agents shall be inspected either manually or by means of an electronic monitoring device/system at intervals no fewer than 20, and no greater than 40, days following the previous inspection.

Statement of Problem and Substantiation for Public Comment

The current 31 day maximum interval is not practical in reality (given human elements, work schedules, holidays, illness, vacations, etc). I am certain the intent is for extinguishers to receive inspection once per month, at an interval that is neither too close to, nor too far from, the previous inspection. The 20 to 40 day range provides a reasonable, practical and achievable interval that, if followed, will reasonably ensure equipment reliability. If 20 days would be considered too soon, or 40 days too late, then adjust to what would be considered reasonable and practical...22 days and 38 days...24 days and 36 days. Practicality is the key.

Related Item

Public Input No. 186-NFPA 10-2014 [Section No. 7.2.1.2 [Excluding any Sub-Sections]]

Submitter Information Verification

Submitter Full Name: THOMAS KRETZLER
Organization: ALBANY FIRE EXTINGUISHER SALES & SERVICE, INC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Aug 28 11:46:50 EDT 2015

Committee Statement

Committee Action: Rejected

Resolution: No technical data has been submitted to substantiate a greater interval between inspections. The maximum interval is selected to coincide with achieving twelve monthly inspections per year.

Public Comment No. 7-NFPA 10-2015 [Sections 7.2.1.2, 7.2.1.3, 7.2.1.4]

Sections 7.2.1.2, 7.2.1.3, 7.2.1.4

7.2.1.2*

Fire extinguishers and Class D extinguishing agents shall be inspected either manually or by means of an electronic monitoring device/system at intervals not exceeding 31 days.

7.2.1.2.1

Fire extinguishers and Class D extinguishing agents shall be inspected at least once per calendar month.

7.2.1.3

In facilities where fire extinguisher inspections are scheduled and tracked via an electronic database the inspection interval shall not exceed 45 days,and in no case will the average time between inspections be allowed to exceed 31 days without regard to calendar months.

7.2.1.4 *

Fire extinguishers and Class D extinguishing agents shall be manually inspected daily or weekly when conditions exist that indicate the need for more frequent inspections.

7.2.1.4 5

Extinguishers that are electronically monitored for location only, such as those monitored by means of a switch to indicate when the extinguisher is removed from its bracket or cabinet, shall be manually inspected in accordance with 7.2.2.

Statement of Problem and Substantiation for Public Comment

NFPA 10 has long asserted that the intent of the code is to require 12 inspections with one inspection per month. At many smaller facilities where this inspection work is done by personnel during the normal course of their duties who work on site full time the current requirements are not onerous. However at large facilities that utilize outside contractors for these inspections the current requirements are untenable. This requirement is really only able to be fulfilled "to the letter" without changing the basic assumption of how many inspections need to be done by inspecting each extinguisher on the same calendar DAY of each month, otherwise inspections will have to be more frequent than 31 days until the shortened frequency eventually causes 13-14 inspections per year or more depending on scheduling.

Our client currently owns approximately 5500 extinguishers including large numbers of extinguishers in clean rooms and other dangerous to access locations. These extinguishers are inspected on a 4 week rotation by trained dedicated inspectors. Each inspection has a window of time to be performed. These inspections are scheduled and tracked by a preventative maintenance system designed to FDA standards. Because of the access requirements etc the exact day that each extinguisher is inspected can vary within the inspection window. In order to fully comply with the code as written our client would in effect be forced to change to a 2 or 3 week inspection interval at significant expense to their operations. The calendar month requirement as far as I can work out appears to be biased to the idea that extinguishers still have monthly inspection tags and those tags need filled out. Our client's need both to eliminate paper in sensitive processing areas and to prevent well-meaning employees from inspecting extinguishers themselves (or calling every time one isn't updated on the first of the month) precludes the use of tags. I cannot see how anyone can argue that a company inspecting extinguishers 13 times a year is not meeting the intent of the code.

Even using an aggressive scheduling window (much more aggressive than the client currently utilizes) such as 28 days apart, 9 days to complete (5 business days plus 2 weekends to ensure that no mater what day the scheduled start is you get a business week to complete which does not give any regard to holidays etc) you could see a deviation of up to 46 days between inspections. However if you inspected at the far ends of both windows you would ultimately end up with much shorter duration between them and the adjacent PMs. This also can cause months to be skipped even with 13 inspections per year. Trying to complete the inspection of 1300 plus extinguishers in one week every 4 weeks is a daunting task for the contractor.

While our client is not the norm, I am sure they are not the only one facing this issue. I believe our client to be at the forefront of fire protection compliance, and if they are having a hard time fulfilling a requirement I don't believe it's because of a lack of effort on their part. My only stake in this is as a code researcher for the client, our company does not handle fire extinguisher inspection. As a CFPS, and multiple NICET certificate holder I could not find a reasonable basis to defend the standard as written in the last 2 editions. Even if my change as written is not acceptable I believe the committee needs to strongly reconsider the direction the code has taken on this issue and provide a solution that is workable for owners in large scale facilities as well as volume service providers who I seriously doubt are working Sundays to make sure every month on the same calendar day that extinguishers are inspected. I believe the current writing does less to increase compliance and safety than it will to increase the number of code violation citations.

Related Item

Public Input No. 186-NFPA 10-2014 [Section No. 7.2.1.2 [Excluding any Sub-Sections]]

Submitter Information Verification

Submitter Full Name: MIKE MOREY
Organization: BMWC CONSTRUCTORS
Street Address:
City:
State:
Zip:
Submittal Date: Thu Sep 10 08:26:02 EDT 2015

Committee Statement

Committee Action: Rejected
Resolution: No technical data has been submitted to substantiate a greater interval between inspections. The maximum interval is selected to coincide with achieving twelve monthly inspections per year.

Public Comment No. 4-NFPA 10-2015 [Section No. 7.3.4.1 [Excluding any Sub-Sections]]

Each fire extinguisher shall have a tag or label securely attached that indicates that maintenance was performed.

Add: Any extinguisher due, or past due, for internal maintenance or hydrostatic testing shall not be tagged or labeled as having undergone maintenance until such internal maintenance or testing has been performed.

Statement of Problem and Substantiation for Public Comment

Some service agents seem to have adopted a procedure in which they will tag extinguishers for annual maintenance year after year without ever addressing the required internal maintenance or hydrostatic testing.

The result: Portable extinguishers giving the appearance to owners, AHJ's and others that they are current on all maintenance & testing requirements, when they are in fact out of compliance, potentially unsafe and more prone to malfunction.

The language I have proposed will close the loophole which currently seems to be allowing service agents to tag non-compliant equipment.

Related Item

First Revision No. 40-NFPA 10-2015 [Section No. 7.3.4.3]

Submitter Information Verification

Submitter Full Name: THOMAS KRETZLER
Organization: ALBANY FIRE EXTING SALES SVC
Street Address:
City:
State:
Zip:
Submittal Date: Thu Aug 27 11:05:44 EDT 2015

Committee Statement

Committee Action: Rejected
Resolution: The comment is not topically related to First Revision No. 40. It constitutes new material that cannot be introduced at this stage of the process.

Public Comment No. 49-NFPA 10-2015 [Section No. 7.3.6]

7.3.6 Six-Year Internal Examination of Certain Types of Extinguishers.

Every 6 years, following the required 12-year hydrostatic test, stored-pressure fire extinguishers ~~that require a 12-year hydrostatic test~~ shall be emptied and subjected to the applicable internal and external examination procedures ~~as detailed in the manufacturer's service manual and this standard~~ .

7.3.6.1

When the applicable maintenance procedures are performed during periodic recharging or hydrostatic testing, the 6-year requirement shall begin from that date.

7.3.6.2 * _

The removal of agent from halon agent fire extinguishers shall only be done using a listed halon closed recovery system.

7.3.6.3

Nonrechargeable fire extinguishers shall not be required to have a 6-year internal examination and shall not be hydrostatically tested but shall be removed from service at a maximum interval of 12 years from the date of manufacture.

7.3.6.3.1

Nonrechargeable halon agent fire extinguishers shall be disposed of in accordance with 7.2.3.3.

7.3.6.4 Corrective Action.

When an internal examination of any fire extinguisher reveals a deficiency, immediate corrective action shall be taken.

7.3.6.5 * _ Six-Year Internal Examination Label.

Fire extinguishers that pass the applicable 6-year requirement of 7.3.6 shall have the maintenance information recorded on a durable weatherproof label that is a minimum of 2 in. × 3 ½ in. (51 mm × 89 mm).

7.3.6.5.1

The new label shall be affixed to the shell by a heatless process, and any previous 6-year internal examination labels shall be removed.

7.3.6.5.2

These labels shall be of the self-destructive type when their removal from a fire extinguisher is attempted.

7.3.6.5.3

The 6-year internal examination label shall, as a minimum, identify the following:

(1) Month and year the 6-year internal examination was performed

(2) Person performing the work

(3) Name of the agency performing the work

Statement of Problem and Substantiation for Public Comment

The NFPA installed the requirement for six-year internal examination of fire extinguishers in 1985 as a manufactures recommendation. I understand at that time the extinguishers may have been being serviced with air. This created valve, stem and O-ring issues. Today extinguishers are serviced from the manufacture with nitrogen. Discharging a factory filled extinguisher that has no issues to prevent issues is illogical when measured against Public Input #141. NFPA 7.3.6.3 “Nonrechargeable fire extinguishers shall not be required to have a 6 year internal examination and shall not be hydrostatically tested but shall be removed from service at a maximum interval of 12 years from the date of manufacture.”

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 50-NFPA 10-2015 [Section No. 7.3.6]	

Related Item

Public Input No. 141-NFPA 10-2014 [Section No. 7.3.6.3 [Excluding any Sub-Sections]]

Submitter Information Verification

Submitter Full Name: DOUGLAS J BANKSTON
Organization: FORT KNOX FIRE DEPT
Street Address:
City:
State:
Zip:
Submittal Date: Tue Oct 27 10:59:22 EDT 2015

Committee Statement

Committee Action: Rejected

Resolution: A three-year NAFED survey was conducted on over 47,000 fire extinguishers, and internal deficiencies were found in 22 percent of the units, which included some factory-filled extinguishers. The submitter's substantiation is not accurate and is not convincing to support the change. For example, the six-year maintenance has been required since 1973, and the statement regarding problems with valve stems and o-rings is speculative. The proposed text would delete the reference to the manufacturer's manual, which is not acceptable, and would delete the specification that the requirement applies to extinguishers requiring a 12-year hydrostatic test.

Public Comment No. 50-NFPA 10-2015 [Section No. 7.3.6]

7.3.6 Six-Year Internal Examination of Certain Types of Extinguishers.

Every 6 years, stored-pressure fire extinguishers that require a 12-year hydrostatic test shall be emptied and subjected to the applicable internal and external examination procedures as detailed in the manufacturer's service manual and this standard.

7.3.6.1

When the applicable maintenance procedures are performed during periodic recharging or hydrostatic testing, the 6-year requirement shall begin from that date.

7.3.6.2*

The removal of agent from halon agent fire extinguishers shall only be done using a listed halon closed recovery system.

7.3.6.3

Nonrechargeable fire extinguishers shall not be required to have a 6-year internal examination and shall not be hydrostatically tested but shall be removed from service at a maximum interval of 12 years from the date of manufacture.

7.3.6.3.1

Nonrechargeable halon agent fire extinguishers shall be disposed of in accordance with 7.2.3.3.

7.3.6.4 Corrective Action.

When an internal examination of any fire extinguisher reveals a deficiency, immediate corrective action shall be taken.

7.3.6.5* Six-Year Internal Examination Label.

Fire extinguishers that pass the applicable 6-year requirement of 7.3.6 shall have the maintenance information recorded on a durable weatherproof label that is a minimum of 2 in. × 3 ½ in. (51 mm × 89 mm).

7.3.6.5.1

The new label shall be affixed to the shell by a heatless process, and any previous 6-year internal examination labels shall be removed.

7.3.6.5.2

These labels shall be of the self-destructive type when their removal from a fire extinguisher is attempted.

7.3.6.5.3

The 6-year internal examination label shall, as a minimum, identify the following:

(1) Month and year the 6-year internal examination was performed

(2) Person performing the work

(3) Name of the agency performing the work

Statement of Problem and Substantiation for Public Comment

Six year maintenance of rechargeable extinguishers is an unnecessary cost to the consumer.The initial resolution is a substantial savings of tax payer dollars. Federal fire departments having adopted the NFPA have an obligation to adhere to the standards. The man hours alone on this installation are cost prohibitive. We house the largest government facility outside of the pentagon nearly 1M sq. ft. We are allotted zero funding for parts, labor or maintenance of the hundreds of extinguishers in this or the other 900 facilities on this installation. The major extinguisher manufactures now charge with nitrogen reducing the chance of caking and corrosion. There have been suggestions to remove extinguishers completely from facilities that are fully sprinkled, (of which I am not a

proponent). The fact that non-rechargeable extinguisher can remain in service for 12 years without service, yet a factory serviced rechargeable must undergo 6 year maintenance. Are there separate schools of thought as to the importance of extinguishers? If so why not re-evaluate this 30 year old requirement. If a six year inspection is to remain a requirement for rechargeable extinguishers then I propose it go into effect 6 years after the 12 year hydrostatic test.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 49-NFPA 10-2015 [Section No. 7.3.6]	

Related Item

Public Input No. 114-NFPA 10-2013 [Section No. 5.1.2]

Submitter Information Verification

Submitter Full Name: DOUGLAS J BANKSTON
Organization: FORT KNOX FIRE DEPT
Street Address:
City:
State:
Zip:
Submittal Date: Tue Oct 27 12:42:39 EDT 2015

Committee Statement

Committee Action: Rejected
Resolution: The submitter did not provide any recommended revisions.

Public Comment No. 54-NFPA 10-2015 [Section No. K.1.2]

K.1.2 Other Publications.

K.1.2.1 ACA Publications.

American Coatings Association, 1500 Rhode Island Avenue, NW, Washington, DC 20005.

Hazardous Materials Identification System (HMIS) Implementational Manual, Fourth Edition.

K.1.2.2 CGA Publications.

Compressed Gas Association, 14501 George Carter Way, Suite 103, Chantilly, VA 20151-1788.

CGA C-1, *Methods for Pressure Testing Compressed Gas Cylinders*, 2009.

K.1.2.3 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 1093, *Standard for Halogenated Agent Fire Extinguishers*, 1995, revised 2008. **(Withdrawn)**

K.1.2.4 ULC Publications.

Underwriters' Laboratories, 7 Underwriters Road, Toronto, Ontario M1R 3A9, Canada.

ULC CAN ~~/ULC~~ -S512, *Standard for Halogenated Agent Hand and Wheeled Fire Extinguishers*, 2005, reaffirmed 2007.

K.1.2.5 UL/ULC Publications.

The following publications are binationally harmonized standards for Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096, and Underwriters' Laboratories of Canada, 7 Underwriters Road, Toronto, Ontario M1R 3A9, Canada.

~~ANSI/~~ UL 299, **ULC CAN** ~~/ULC~~ -S504, *Standard for Dry Chemical Fire Extinguishers*, 2012.

~~ANSI/~~ UL 711, **ULC CAN** ~~/ULC~~ -S508, *Standard for Rating and Fire Testing of Fire Extinguishers*, 2013.

~~ANSI/~~ UL 2129, **ULC CAN** ~~/ULC~~ -S566, *Standard for Halocarbon Clean Agent Fire Extinguishers*, 2014.

Statement of Problem and Substantiation for Public Comment

UL 1093 has been withdrawn.

Related Item

First Revision No. 11-NFPA 10-2015 [Section No. K.1.2]

Submitter Information Verification

Submitter Full Name: Aaron Adamczyk
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Mon Nov 09 23:13:54 EST 2015

Committee Statement

Committee Action: Accepted
Resolution:

Statement: Reference updates.