

# SCHULTE & ASSOCIATES

Building Code Consultants  
880D Forest Avenue  
Evanston, IL 60202  
fpeschulte@aol.com  
847/866-7479

## TESTIMONY TRANSCRIPTS CODE CHANGE PROPOSAL F144-09/10

The following are transcripts of testimony on code change proposal F144-09/10 at the ICC code development hearings held in Baltimore in late October, 2009. The transcripts are followed by the provisions addressing roof vents included in the 2010 edition of NFPA 13, along with the substantiation statement made in support of the proposed revised provisions.

It should be noted that the substantiation statement for the provisions addressing the installation of roof vents in buildings protected by a sprinkler system is completely “at odds” with the statements made in the testimony.

**William Koffel, Koffel & Associates:** *To the modification. As Carl [Baldassarra] said, the name of this committee is Code Technology Committee, but their proposal is eliminating a technology that has been used for years without adequate substantiation. So, the nature of our modification is merely in sprinklered buildings to give the option using mechanical system or to use vents as we've used for a number of years. Now, in their supporting statement, they identify several reasons for doing this. In the second to the last paragraph on the first page of their substantiation, they indicate that the differential on the smoke temperatures will be approximately 198°F. I don't see where they came up with that. In fact, Carl stood here earlier and said that the test to determine adequate sprinkler performance is that temperatures do not threaten the structural steel system. That's substantially higher than the temperatures that they just referenced here. And in fact, NFPA 13 encourages the use of high temperature, 286°F sprinklers, in this type of occupancy. So, we clearly could have temperatures in excess of what they've identified. Secondly, they talk about a recommendation of the NFPA 204 committee. I sit on the NFPA smoke management committee responsible for 204. I'm not representing that committee here. I sit on NFPA 13 discharge criteria committee which is responsible for Chapter 12. I'm not representing that committee. But I think this committee needs to know that NFPA 13 now allows vents and draft curtains in buildings protected throughout with a sprinkler system. In fact, they've even gone so far to allow it in a building with ESFR sprinklers, smoke vents that is, if the vents have a certain criteria. That's in Chapter 12 of the 2010 edition of NFPA 13. So the 13 committee recognizes that this is a viable technology in sprinklered buildings. 204 has a proposal, or a comment, that is being balloted now that has a new chapter for designing smoke vents in buildings protected with a sprinkler system, so the technology is being addressed by the appropriate NFPA committees. Thank you.*

**Robert Davidson, RJD:** Robert Davidson, representing National Association of State Fire Marshals [NASFM]. When this whole path started and with all the work CTC has done on this, it really started out if you go back several cycles, the argument was they don't work the sprinklers; we gotta get the smoke and heat vents out. And a lot of data was gone on, there was hearing after hearing of presentations and, unfortunately, *there isn't clear data one way or the other on it.* However, in the meantime, as they started looking further into it, things change. *The NFPA 13 committee now has changed and said there is a way to do it. The NFPA 204 standard you reference now has language in Appendix F that said there wasn't any clear detriment and you can do it, so that's where it stood. Now all this does is makes this an exception, in other words a design option. You're still sticking with the primary goal of moving toward the mechanical exhaust which in the existing code is only if the code official approves, so we're still getting the benefit of mechanical exhaust with this modification.*

**Ruth:** Julie Ruth, J. Ruth Code Consulting, representing the AHMA [AAMA] Smoke Vent Task Group in regards to this. We're in support of this modification. Having participated or sat in on some of the CTC meetings and stuff for the last couple of years, the question that kept coming up was, 'Is the current requirements of the IFC for smoke and heat vent design appropriate?' And, when we look at it, and we see that these are things that have been in the code for a long time, many of them probably put in there, perhaps put in there before the sprinkler requirements were put in, maybe not, with regards to how these would interact with sprinkler systems. So, we started looking at 'where is this being addressed?' *Well, it's being addressed in 204 as you already heard. NFPA 13 permits it and we feel that it is important to continue to allow the use of these when they're appropriately designed as guided by NFPA – and I think that's it.*

**NFPA 13 (2010 edition):**

*“Manually operated roof vents or automatic roof vents with operating elements that have a higher temperature classification than the automatic sprinklers shall be permitted.”*

**“Substantiation:** *The intent of the standard is that roof vents and draft curtains should not be used in conjunction with storage protection.”*

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