

SCHULTE & ASSOCIATES

Building Code Consultants
880D Forest Avenue
Evanston, IL 60202
fpeschulte@aol.com
504/644-8900

July 5, 2011

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

Re: Formal Interpretation Request
Roof Vent Requirements
NFPA 13/NFPA 204

Ladies and Gentlemen:

The 2007 edition of NFPA 204, the Standard for Smoke and Heat Venting, includes Annex F.3 which makes reference to the concept of the “ganged” operation of roof vents. The following are excerpts from Annex F.3 in the 2007 edition of NFPA 204:

“The effect of control mode sprinkler cooling may limit the number of vents opening if control of the vent is only by fusible link or if drop-out panels are used. If the fusible link or if drop-out panel operating temperature is equal to or higher than the control mode sprinkler fusible element operating temperature, then vents outside the outer ring of operating control mode sprinklers are unlikely to open. This could significantly limit the effectiveness of the smoke vent system. Use of ganged vents operated from detectors or a sprinkler flow switch is a way to avoid this situation.”

“Design practices should move to methods that assure early operation of vents, and vent operation should be ganged so that the benefits of roof vents is fully realized.”

Since the publication of the 2007 edition of NFPA 204, provisions which address the use of roof vents in storage occupancies protected by a sprinkler system have been included in the 2010 edition of NFPA 13. It appears that the roof vent provisions now included in NFPA 13 are in conflict with the recommendations for the use of the “ganged” operation of roof vents contained in NFPA 204. In order to resolve this apparent conflict between NFPA 13 and NFPA 204, Schulte & Associates would like to request that the following questions be processed as formal interpretations of the 2010 edition of NFPA 13:

Is it the intent of Section 12.1.1.1 in the 2010 edition of NFPA 13 to prohibit the “ganged” operation of roof vents where the opening of the roof vents is initiated by the activation of the sprinkler water flow indicator?

Is it the intent of Section 12.1.1.1 in the 2010 edition of NFPA 13 to prohibit the “ganged” operation of roof vents where the opening of the roof vents is initiated by a smoke detection system?

Is it the intent of Section 12.1.1.1 in the 2010 edition of NFPA 13 to prohibit the “ganged” operation of roof vents where the opening of the roof vents is initiated by a manually-activated switch?

The conflicts between roof vent provisions included in the 2010 edition of NFPA 13 and NFPA 204 were noted in NITMAM 204-1 submitted by Schulte & Associates. The Association’s action on NITMAM 204-1 at the Technical Meeting held on June 15, 2011 is the subject of an appeal to the NFPA Standards Council submitted by Schulte & Associates. Attached is Schulte & Associates’ letter to the Standards Council dated June 24, 2011.

Yours Very Truly,

Richard Schulte
Schulte & Associates

cc: T. Golinveaux, Smoke Management Committee Staff Liaison
L. Fuller, NFPA Standards Council

attach.