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## NFPA ANNUAL MEETING TESTIMONY: NFPA 204

By Richard Schulte

On Wednesday, June 15, 2011, the Smoke Management Committee's report on NFPA 204 will be discussed at the Technical Meeting at the Annual Meeting of the National Fire Protection Association (NFPA) being held in Boston. A motion to return the entire report back to the Smoke Management Committee for further study will be made (by the author).

The following is testimony which will be presented in support of this motion (by the author):

"The use of roof vents in buildings protected by sprinklers has been debated for at least 35 years, maybe longer. Two years ago, the NFPA 13 committee settled the debate on roof vents and sprinklers when the committee included roof vent provisions in NFPA 13. The substantiation for the roof vent provisions in NFPA 13 reads as follows:

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

That statement seems pretty straight-forward, but the original proposal which was submitted back in 2007 reads as follows:

*"Roof vents and draft curtains shall not be used in conjunction with the sprinkler protection criteria for storage in this standard."*

In a comment on the proposed roof vent provisions to be included in NFPA 13, Mr. Multer proposed the following language be included in the Annex.

*". . . the use of smoke vents and draft curtains can be detrimental to all sprinklers that are specifically tested for storage applications."*

Based upon these statements, it would seem that there is a conflict between the NFPA 13 and NFPA 204 committees.

In 2009, a member of the Smoke Management Committee, Michael Dillon, Dillon Consulting Engineers, Inc., submitted a comment which reads:

*“The document prematurely and improperly requires and relies upon unproven methods of calculation for the effectiveness of smoke and heat vents in the presence of automatic water-based sprinkler protection systems. It also relies on calculations of questionable accuracy to determine activation times for the vents and the sprinklers.”* 204-1 Log #5 (December 2009)

To date, the Smoke Management Committee has not addressed Mr. Dillon’s comment.

In 2008, Hughes Associates, Inc. published a research study on the concept of the “ganged” operation of roof vents. In March 2009, the Smoke Vent Task Group characterized the research as *“worthless”*. [March 24, 2009]

One year ago at the NFPA meeting in Las Vegas, William Koffel stated the following about Chapter 11 in NFPA 204:

*“We think this is a baby step forward.”*

Since the NFPA meeting in Las Vegas, nothing substantial, other than making a reference to the new NFPA 13 roof vent provisions, has been added to Chapter 11 of NFPA 204.

Given that the Smoke Management Committee has not resolved the conflict with NFPA 13, nor addressed Mr. Dillon’s comment, it seems that the Smoke Management Committee has some more work to do and that the Technical Committee Report should be returned for further study.”

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