

SCHULTE & ASSOCIATES

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

DRAFT

June 18, 2011

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

Re: Standards Council Appeal
NFPA 204

Ladies and Gentlemen:

NITMAM 204-1 which requested that the Smoke Management Committee's Technical Report on NFPA 204 be returned to the Committee for further study was discussed at the NFPA's Technical Meeting and failed. Schulte & Associates would like to request that the Association's action on NITMAM 204-1 be reviewed by the Standards Council and it is requested that the Association's action at the Technical Meeting be reversed and the Technical Committee Report be returned for further study.

The following are the basis for this request:

- **Sprinkler System Design Criteria.** The Committee's proposal for Chapter 11 in NFPA 204 includes sprinkler system design criteria (where draft curtains are provided). The inclusion of sprinkler system design criteria in NFPA 204 is outside the scope of the NFPA 204 document. The sprinkler design criteria proposed by the Committee should be included in NFPA 13, not NFPA 204.
- **Conflict Between NFPA 13 and NFPA 204.** The substantiation statement for the roof vent provisions included in the 2010 edition of NFPA 13 specifically states that "*the intent of the standard is that roof vents and draft curtains should not be used in conjunction with storage protection.*" The Smoke Management Committee's proposed Chapter 11 does not acknowledge the intent of the NFPA 13 provisions addressing the installation of roof vents/draft curtains and implies that the use of roof vents/draft curtains in sprinklered buildings is accepted engineering practice.

- **Performance-Based Analysis.** The Smoke Management Committee's proposed Chapter 11 requires that a performance-based analysis be utilized in the design of roof vent/draft curtain systems in buildings provided with sprinkler protection. The Smoke Management Committee's proposed Chapter 11 (including Annex text) does not acknowledge that the tools necessary to perform the required analysis are not presently available. (Hence, the required analysis cannot actually be actually performed.)

This point was addressed in a comment by a member of the Smoke Management Committee, Michael Dillon, in the following comment:

"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)

The Smoke Management Committee has yet to address Mr. Dillon's comment.

This same point was also made in testimony by Messrs. O'Connor and Balassarra at the NFPA Technical Meeting held in Las Vegas in June 2010.

Thank you for your consideration of the above request.

Yours Very Truly,

Richard Schulte
Schulte & Associates

cc: T. Golinveaux, Smoke Management Committee Staff Liaison
R. Solomon, NFPA

attach.