



## Public Comment No. 3-NFPA 1126-2024 [ Sections 1.1, 1.2 ]

### Sections 1.1, 1.2

#### 1.1 Scope.

This standard shall provide requirements for the protection of property, operators, performers, support personnel, and the viewing audiences where pyrotechnic effects are used indoors or outdoors with a proximate audience.

#### 1.2 Purpose.

##### 1.2.1

The purpose of this standard shall be to provide ~~minimum~~ requirements ~~to~~ for the reasonable protection of pyrotechnic operators, performers, support personnel, proximate audiences, property and manufacturers for the safe operation of pyrotechnic effects.

##### 1.2.2\*

The purpose of this standard shall be to provide requirements to protect pyrotechnic operators, performers, support personnel, proximate audiences, property, and buildings ~~from safety and fire hazards~~ where pyrotechnics are used indoors or outdoors from safety and fire hazards.

##### A. 1.2. 2

Potential health hazards from pyrotechnic smoke and combustion byproducts require a risk assessment and appropriate precautions if the risk is significant.

##### 1. 2.2. 1

The purpose of this standard shall be to provide guidelines to the authority having jurisdiction for approval of the use of pyrotechnics as specified in 1.2.2.

##### 1.2.2.2

The purpose of this standard shall be to provide requirements for local permits.

## Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
NFPA-160_and_1126-proposed-revisions_PC_M_Rossol.pdf	NFPA 1126_PublicComment_M.Rossol	

## Statement of Problem and Substantiation for Public Comment

Appendix A mentions that health effects are not considered, but no mention is made of the fact that there are OSHA and other regulations laws that required a risk assessment of these health effects before exposing workers as well.

One of these rules is the OSHA Hazard Communication (1910.1200). And in the worker training

requirements is addressing is the difference between safety and health hazards. Safety hazards are well-addressed by NFPA 1126. But NFPA 1126 does not address health hazards from exposure to the pyrotechnic reaction products that are made airborne during use of the effect.

There are many toxic metals given off by pyrotechnic effects that are regulated in the workplace air under OSHA and any potential exposure include a risk assessment. For examples, there are OSHA permissible exposure limits (PELs) for silver, lead, titanium, zirconium, antimony, chromium, and more.

Other common pyrotechnic byproduct emissions for which there are OSHA PELs include nitrogen and sulfur oxides.

Production companies, in my experience, assume that meeting NFPA 1126 covers any and all hazards from these effects including health hazards. This was one of the reasons that the use of lead styphnate bullet hits were considered acceptable for many years. Yet these small pyrotechnic effects, often used in multiples, exposed performers and crew to excessive lead fume.

The NFPA 1126 safety and fire precautions are excellent, but they are not enough. Users must be alerted upfront that the standard does not address the health hazards. These hazards also require a risk assessment and additional precautions if warranted.

#### **Related Item**

- First Revision No. 6

### **Submitter Information Verification**

**Submitter Full Name:** Monona Rossol

**Organization:** Arts, Crafts & Theater Safety,

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Mon May 20 13:23:16 EDT 2024

**Committee:** SPE-AAA

### **Committee Statement**

**Committee Action:** Rejected

**Resolution:** The scope of the technical committee and document is only specific to fire and life safety hazards and does not have any scope over the health hazards as it stands. The technical committee would appreciate further technical data to more specifically write more requirements to more accurately address the health hazards rather than modifying the scope to write requirements by omission.

**Public Comment No. 5-NFPA 1126-2024 [ Section No. 3.3.39 ]****3.3.39 Professional-Use-Only Product: Pyrotechnics**

Fireworks and pyrotechnic special effects ~~materials~~ other than those explicitly marked, designed, designated, or approved as consumer fireworks or novelty devices and intended for use only by pyrotechnic professionals.

**Statement of Problem and Substantiation for Public Comment**

Accuracy.

The subject is "pyrotechnics". Products could be anything, so it is better to be specific.

The correct term is pyrotechnic special effects, which includes both pyrotechnic devices and materials.

Fireworks and pyrotechnic special effects that are not consumer fireworks are marked "For Professional Use Only".

**Related Item**

- First Revision No. 12

**Submitter Information Verification**

**Submitter Full Name:** Charles Weeth

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**Submittal Date:** Thu May 30 14:59:53 EDT 2024

**Committee:** SPE-AAA

**Committee Statement**

**Committee Action:** Rejected but see related SR

**Resolution:** SR-3-NFPA 1126-2024

**Statement:** The term professional-use-only pyrotechnics is not used in the standard and the committee prefers to keep the term product at this juncture to align with the NFPA pyrotechnic standards. Additional reference is being made to the appropriate product standards and regulations for these materials.



## Public Comment No. 1-NFPA 1126-2024 [ Section No. 3.3.45 ]

### 3.3.45\* Pyrotechnic Professional.

A person who has demonstrated proficiency and knowledge of NFPA 1123 ~~and or~~ NFPA 1126 via documented training and experience in the use of fireworks, pyrotechnic special effects materials, or professional-use-only products and who complies with the requirements of this standard.

## Statement of Problem and Substantiation for Public Comment

This would bring the definition in line with the submissions for NFPA 1123 and NFPA 1124.

### Related Item

- NFPA 1123 • NFPA 1124

## Submitter Information Verification

**Submitter Full Name:** Joshua Lazarus

**Organization:** J Lazarus Consulting & Trainin

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**Submittal Date:** Mon Mar 18 13:13:00 EDT 2024

**Committee:** SPE-AAA

## Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:** SR-4-NFPA 1126-2024

**Statement:** The specific NFPA standards have been removed to more generally reference NFPA standards as there might be more applicable standards used to qualify a pyrotechnics professional.



## Public Comment No. 2-NFPA 1126-2024 [ Section No. 6.5.1 [Excluding any Sub-Sections] ]

All pyrotechnic operators shall be pyrotechnic professionals, at least 21 years old, and licensed or approved by the authority having jurisdiction in accordance with any and all applicable laws.

### Statement of Problem and Substantiation for Public Comment

This makes NFPA 1126 consistent with the lead operator requirements of NFPA 1123

#### Related Item

- CI

### Submitter Information Verification

**Submitter Full Name:** Joshua Lazarus

**Organization:** J Lazarus Consulting & Trainin

**Street Address:**

**City:**

**State:**

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**Submittal Date:** Thu Apr 04 11:09:44 EDT 2024

**Committee:** SPE-AAA

### Committee Statement

**Committee Action:** Rejected

**Resolution:** There is no proposed text change and the substantiation does not provide any guidance on any proposed changes.



## Public Comment No. 4-NFPA 1126-2024 [ Section No. A.3.3.34 ]

### A.3.3.34 Performer. [🔗](#)

Performers can include, but are not limited to, fire performers, stunt people, actors, singers, musicians, and acrobats who may be of various ages and conditions including children, pregnant women, and the elderly.

## Additional Proposed Changes

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Appendix A mentions that health effects are not considered, but no mention is made of the fact that there are OSHA and other regulations laws that required a risk assessment of these health effects before exposing workers as well.

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### Related Item

- First Revision No. 6

## Submitter Information Verification

**Submitter Full Name:** Monona Rossol

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**Submittal Date:** Mon May 20 13:33:32 EDT 2024  
**Committee:** SPE-AAA

### Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:** [SR-5-NFPA 1126-2024](#)

**Statement:** The annex has been expanded to alert the user on the wide range of people who can be a performer and alert the user to their various conditions when conducting show risk assessments.