## Second Revision No. 11-NFPA 1192-2016 [ Section No. 2.4 ]

**2.4** References for Extracts in Mandatory Sections.

NFPA 54, *National Fuel Gas Code,* ~~2015~~ 2018 edition.

NFPA 58, *Liquefied Petroleum Gas Code,* 2017 edition.

*NFPA 70®*, *National Electrical Code®,* 2017 edition.

NFPA 211, *Standard for Chimneys, Fireplaces, Vents, and Solid Fuel–Burning Appliances,* 2016 edition.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
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**Street Address:**
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**Submittal Date:** Wed Sep 28 09:16:30 EDT 2016

### Committee Statement

**Committee Statement:** Updated reference to current edition.
**Response Message:**

## Second Revision No. 9-NFPA 1192-2016 [ New Section after 3.3.35 ]

**3.3.36** Loft.

A raised interior area that has at least a 5 ft (1.52 m) vertical drop except for areas intended for sleeping only or storage only, such as motorhome and truck camper cabovers, fifth-wheel upper decks, bunk beds, and bed lift systems.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
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**Street Address:**
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**Submittal Date:** Tue Sep 13 12:59:26 EDT 2016

### Committee Statement

**Committee Statement:** The current section 6.6.1, 6.6.1.1 and 6.6.1.2 identified in the First Revision No. 58 are unnecessary. A raised interior area would not be deemed to have to meet additional exit requirements as existing requirements apply. In addition, section 6.6.2 smoke alarms, identified in the First Revision No. 58 is unnecessary because the current NFPA 1192 Section 6.3.1 smoke alarm requirements adequately address this concern. The definition of “loft” has been revised (3.3.36) to better address what a loft is and identifies specific exemptions for clarification.

Renumber remaining definition sections accordingly.

**Response Message:**

## Second Revision No. 1-NFPA 1192-2016 [ Section No. 6.1.3 ]

~~**6.1.3** Use of Cellular Foam or Foamed Plastic Materials.~~

~~**6.1.3.1**~~

~~Cellular foam or foamed plastic materials shall not be used for insulation or interior finish *(see 3.3.35, Interior Finish)* in recreational vehicles, except for the incidental uses as permitted in 6.1.3.2.~~

~~**6.1.3.2**~~

~~The cellular or foamed plastic materials shall be permitted to be used for incidental use in molding, trim, splash panels, and on doors but only if the material has a maximum thickness of ½ in. (12.7 mm), a maximum width of 8 in. (204 mm), and does not constitute more than 10 percent of the specific area to which it is attached.~~

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
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**Submittal Date:** Tue Sep 13 11:34:49 EDT 2016

### Committee Statement

**Committee Statement:** This paragraph should be deleted since paragraph 6.1.1 already addresses all materials used for interior finish, including cellular foam materials. If cellular foam or foamed plastic materials are proven to have a flame spread index that does not exceed 200 when tested in accordance with ASTM E84 or ANSL/UL 723 they should be permitted to be installed. This code requirement in 6.1.3 was put in the standard many years ago to address the use of spray on cellular foam materials like those that caused a catastrophic fire at the MGM Grand Hotel in 1980. Today cellular foam can be safely used in many materials that can meet the 6.1.1 flammability requirements, such as fake fireplace brick. Since these materials can meet current 6.1.1 flame spread requirements they should be treated the same as any other interior finish material. Fire codes for the RV application have always been based on the philosophy that the occupant should exit the RV as quickly as possible and only then try to save the RV.

**Response Message:**

Public Comment No. 11-NFPA 1192-2016 [Section No. 6.1.3]

Public Comment No. 20-NFPA 1192-2016 [Section No. 6.1.3]

## Second Revision No. 2-NFPA 1192-2016 [ Section No. 6.4.5.3 ]

**6.4.5.3**

Generator exhaust pipe shall be secured and supported at a maximum of every 4 ft (1.2 m) within the run.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
**State:**
**Zip:**
**Submittal Date:** Tue Sep 13 11:39:07 EDT 2016

### Committee Statement

**Committee Statement:** There exist installation instructions for RV generators that require tailpipe hangers on pipe over 1 ½ ft. are to be at intervals of 3 ft. or less. Therefore the additional language would allow for following the installation instructions that might call out specific criteria.

**Response Message:**

Public Comment No. 18-NFPA 1192-2016 [Section No. 6.4.5.3]

## Second Revision No. 3-NFPA 1192-2016 [ Section No. 6.4.6.5 ]

**6.4.6.5**

In recreation vehicles having a permanent wall of separation between the cargo area and the living area, an additional listed portable fire extinguisher with a minimum rating of 10-B:C, as defined in NFPA 10, shall be provided in the special transportation area within 24 in. (610 mm) of the exterior door that serves the special transportation area.

**6.4.6.5.1**

In towable recreation vehicles without a permanent wall of separation between the cargo area and the living area, the fire extinguisher required by 6.4.1.3 shall have a minimum rating of 10-B:C, as defined in NFPA 10 .

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
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**Submittal Date:** Tue Sep 13 11:52:13 EDT 2016

### Committee Statement

**Committee Statement:** This addresses the negative comment that correctly pointed out that a 10 B:C fire extinguisher should still be required for a towable special transportation unit without a wall of separation. This new paragraph would provide that language.

**Response Message:**

Public Comment No. 21-NFPA 1192-2016 [Section No. 6.4.6.5]

Public Comment No. 19-NFPA 1192-2016 [Section No. 6.4.6.5]

## Second Revision No. 10-NFPA 1192-2016 [ Section No. 6.6 ]

**6.6** Loft Requirements.

**~~6.6.1~~** ~~Means of Escape.~~

**~~6.6.1.1~~**

~~Each loft area shall have a minimum of one exit in addition to the staircase or ladder into the loft area.~~

**~~6.6.1.2~~**

~~This exit shall provide direct access to the exterior and comply with Section 6.2 .~~

**~~6.6.2~~** ~~Smoke Alarms.~~

~~In addition to the smoke alarm required by Section 6.3 , each loft area shall have at least one smoke alarm installed that shall comply with 6.3.1.3 through 6.3.1.5 .~~

**6.6.1** Stairways .

**6.6.1.1** Width.

**6.6.1.1.1**

Stairways shall be not ~~be~~ less than 17 in. (432 mm) in clear width at all points at or above the ~~permitted~~ handrail.

**6.6.1.1.2**

The minimum width below the handrail height shall be not ~~be~~ less than 20 in. (508 mm).

**6.6.1.2** Treads and Risers.

**6.6.1.2.1**

Treads shall be a minimum of 7 in. (178 mm) and risers shall be a maximum of 12 in. (305 mm).

**6.6.1.2.2**

Tread depth and risers height shall be permitted to be calculated based on one of the following formulas:

$$\text{Minimum tread depth} = 20 \text{ in. } (508 \text{ mm}) = \frac{4}{3} \text{ riser height}$$ **~~[6.6.3.2.2a]~~** **[6.**

$$\text{Maximum riser height} = 15 \text{ in. } (381 \text{ mm}) = \frac{3}{4} \text{ tread depth}$$ **~~[6.6.3.2.2b]~~** **[6.**

**6.6.1.3** Uniformity of Treads and Risers.

The greatest riser height within any flight of stairs, ~~other~~ other than the top riser, shall not exceed the smallest by more than ⅜ in. (10 mm).

**6.6.2** Handrails.

**6.6.2.1**

Handrails having a minimum height of 30 in. (762 mm) and a maximum height of 38 in. (965 mm), measured vertically from the nosing of the treads, shall be provided on at least one side of stairways that extend at least 5 ft (1.52 m) above the main RV floor.

**6.6.2.1.1**

Spiral stairways shall have the required handrail located on the outside radius.

**6.6.2.1.2**

All required handrails shall be continuous the full length of the stairs.

**6.6.2.1.3**

Ends shall be returned or shall terminate in newel posts or safety terminals.

**6.6.2.1.4**

Handrails adjacent to a wall shall have a space not less than 1 ½ in. (38 mm) between the wall and the handrail.

**6.6.2.1.5**

Handrail grip size shall have either a circular cross section with a diameter of 1 ¼ in. (32 mm) to 2 in. (51 mm) or a noncircular cross section with a perimeter of at least 4 in. (102 mm) but not more than 6 ¼ in. (159 mm) and a largest cross-sectional dimension not exceeding 2 ¼ in. (57 mm).

**6.6.2.1.6**

Edges shall have a minimum radius of ⅛ in. (3 mm).

**6.6.3** Guardrails.

**6.6.3.1**

Guardrails on open sides of stairways and lofts shall have intermediate rails or ornamental closures that do not allow passage of an object 4 in. (102 mm) or more in diameter.

**6.6.3.2**

Lofts shall have guardrails not less than 36 in. (914 mm) in height or one-half the maximum clear height to the ceiling, whichever is less.

**6.6.3.3**

Open sides of stairs to lofts shall have guardrails not less than 34 in. (864 mm) in height measured vertically from the nosing of the treads.

## Supplemental Information

| File Name | Description |
|---|---|
| NFPA_AdHoc_Loft_Recommendation.docx | Loft Requirements. For staff use. |

## Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** National Fire Protection Assoc
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**City:**
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**Zip:**
**Submittal Date:** Mon Sep 26 07:55:57 EDT 2016

## Committee Statement

**Committee Statement:** The current section 6.6.1, 6.6.1.1 and 6.6.1.2 identified in the First Revision No. 58 are unnecessary. A raised interior area would not be deemed to have to meet additional exit requirements as existing requirements apply. In addition, section 6.6.2 smoke alarms, identified in the First Revision No. 58 is unnecessary because the current NFPA 1192 Section 6.3.1 smoke alarm requirements adequately address this concern. The definition of “loft” has been revised (3.3.36) to better address what a loft is and identifies specific exemptions for clarification.

**Response Message:**

Public Comment No. 22-NFPA 1192-2016 [Section No. 6.6.2]

## Second Revision No. 4-NFPA 1192-2016 [ Section No. 7.3.7.3 ]

**7.3.7.3**

Potable water tanks ~~shall be secured in place so they do not become dislodged~~ shall stay retained in place when a load equal to two times the holding tank's filled weight is applied to the filled ~~holding~~ tank in any direction except upward.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
**State:**
**Zip:**
**Submittal Date:** Tue Sep 13 12:29:33 EDT 2016

### Committee Statement

**Committee Statement:** The committee recognizes the submitter's concern but does require two times the weight be used when calculating restraint of potable water tanks.

**Response Message:**

Public Comment No. 2-NFPA 1192-2016 [Section No. 7.3.7.3]

## Second Revision No. 5-NFPA 1192-2016 [ Section No. 7.3.7.4 ]

**7.3.7.4**

The tank manufacturer shall provide within their installation instructions ~~on how~~ a ~~potable water~~ statement requiring tank ~~is~~ securement to be ~~secured~~ in accordance with 7.3.7.3.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
**State:**
**Zip:**
**Submittal Date:** Tue Sep 13 12:36:31 EDT 2016

### Committee Statement

**Committee Statement:** Tank manufacturers typically do not include materials such as frame members or removable cross members nor the strapping materials needed to accomplish the securement requirements to meet the 7.3.7.3 or 7.5.1.1/7.5.1.2. Tank manufacturers should not be required to champion the method due to the wide variations of RV structures and frame configurations and sizes. They can however require that the install meets the standard and supply needed information about the tank such as size and capacity.

**Response Message:**

Public Comment No. 6-NFPA 1192-2016 [Section No. 7.3.7.4]

## Second Revision No. 6-NFPA 1192-2016 [ Section No. 7.3.7.5 ]

**7.3.7.5***

Tanks that allow filling from the pressure water piping system shall have a vent with an inside diameter, including fittings, larger than or equal to the pressure fill pipe's inside diameter, including fittings.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
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**Street Address:**
**City:**
**State:**
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**Submittal Date:** Tue Sep 13 12:38:08 EDT 2016

### Committee Statement

**Committee Statement:** The tank vent only needs to be equal in size to the pressure fill pipe, not larger. The addition of the word “pressure” provides needed clarification.

**Response Message:**

Public Comment No. 23-NFPA 1192-2016 [Section No. 7.3.7.5]

Public Comment No. 3-NFPA 1192-2016 [Section No. 7.3.7.5]

## Second Revision No. 7-NFPA 1192-2016 [ Section No. 7.5.1.2 ]

**7.5.1.2**

Waste holding tanks ~~shall be secured in place so they do not become dislodged~~ shall stay retained in place when a load equal to two times the holding tank's filled weight is applied to the filled holding tank in any direction except upward.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
**State:**
**Zip:**
**Submittal Date:** Tue Sep 13 12:39:29 EDT 2016

### Committee Statement

**Committee Statement:** The committee recognizes the submitter's concern but does require two times the weight be used when calculating restraint of holding tanks.
**Response Message:**

Public Comment No. 4-NFPA 1192-2016 [Section No. 7.5.1.2]

## Second Revision No. 8-NFPA 1192-2016 [ Section No. 7.5.1.3 ]

**7.5.1.3**

The tank manufacturer shall provide ~~instructions on how a waste holding tank is to be~~ within their instructions a statement requiring the holding tank be secured in accordance with 7.5.1.2.

### Submitter Information Verification

**Submitter Full Name:** Chad Duffy
**Organization:** [ Not Specified ]
**Street Address:**
**City:**
**State:**
**Zip:**
**Submittal Date:** Tue Sep 13 12:43:05 EDT 2016

### Committee Statement

**Committee Statement:** Tank manufacturers typically do not include materials such as frame members or removable cross members nor the strapping materials needed to accomplish the securement requirements to meet the 7.5.1.1/7.5.1.2. Tank manufacturers should not be required to champion the method due to the wide variations in RV construction and frame sizes and configurations. However they can supply needed information such as tank size and capacity.

**Response Message:**

Public Comment No. 8-NFPA 1192-2016 [Section No. 7.5.1.3]