Public Comment No. 1-NFPA 1730-2017 [Section No. 6.7]

6.7 Minimum Inspection Frequency.

6.7.1

~~The AHJ shall perform a community risk assessment to establish minimum inspection frequencies.~~

~~6.7.2~~ * –

~~In the absence of a community risk assessment, existing~~

Existing occupancy fire prevention inspection and code enforcement inspection frequencies shall be not less than those specified in Table 6.7.

~~2~~

1 .

Table 6.7.~~2 Minimum~~ 1 Minimum Inspection Frequency

Occupancy Risk Classification	Frequency
High	Annually
Moderate	Biennially
Low	Triennially
Critical infrastructure	Per AHJ

Statement of Problem and Substantiation for Public Comment

The revision made to NFPA 1730 in FR-2, directing the user to develop existing occupancy inspection frequencies based on a Community Risk Assessment is reasonable....in theory. However, there is no methodology or example provided in NFPA 1730 or NFPA 1300 that specifies how the user is to develop such an inspection frequency schedule. Without such a methodology, the prescriptive provisions of the original text should remain in place until such time the TC develops a methodology in NFPA 1730 or NFPA 1300. Without such a methodology, the direction to "...perform a community risk assessment to establish minimum inspection frequencies" is premature. Without such guidance in NFPA 1730 or NFPA 1300, the current FR language would result in completely different minimum inspection frequencies being developed by different users even if they were confronted with the exactly same risk data. This lack of guidance to a data driven methodology fails to serve the use, the public nor our policy makers. It is also a violation of the NFPA Manual of Style section 2.2.2.1, 2.2.3.1 and 2.2.3.2.

Section 2.2.2.1 of the MOS states that "The main text of codes and standards shall not contain references or requirements that are unenforceable and vague." The current FR language, directing the user to conduct a CRA in order to establish minimum inspection frequencies, without a methodology or direction on how to accomplish that objective, is about as vague as one can get.

Section 2.2.3.1 of the MOS states that "Codes and standards shall state specific criteria that minimizes judgment by the users." The current FR language does not provide any specific criteria on how to develop a CRA with minimum inspection frequencies. Without a methodology or guidance by NFPA 1730 or NFPA 1300, the currently language accomplishes nothing except maximizing the judgment by the users. This is completely contrary to the MOS direction.

Section 2.2.3.2 of the MOS states that "Multiple levels of safety shall not be used in any code or standard." The current FR language creates a situation where multiple levels of safety will be employed. As stated above, without a standard methodology to develop an existing occupancy inspection frequency, users will be left to develop their own. This would result in the situation where 10 users could be confronted with the exact same data and develop 10 radically different inspection frequencies. Each of these differing inspection frequencies would create a different level of safety based on the direction in the standard. This is contrary to the MOS.

Once either the NFPA 1730 document or the NFPA 1300 document evolves to develop a standard methodology for users to create consistent existing occupancy fire inspection frequencies based on the data, the FR language would be appropriate. Until then, we need to return to the original language prior to the FR.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 2-NFPA 1730-2017 [New Section after A.6.6]	Similar issue on existing occupancy fire inspection frequencies
Public Comment No. 3-NFPA 1730-2017 [Section No. 6.7.2]	Similar issue on existing occupancy fire inspection frequencies

Related Item

First Revision No. 2-NFPA 1730-2016 [Section No. 6.7]

Submitter Information Verification

Submitter Full Name: Anthony Apfelbeck
Organization: Altamonte Springs Building/Fire Safety Division
Street Address:
City:
State:
Zip:
Submittal Date: Tue Feb 28 09:53:29 EST 2017

Committee Statement

Committee Action: Rejected

Resolution: The purpose of the community risk assessment and subsequent plan is to identify and develop service delivery levels to address all risk, including periodic inspection of existing occupancies. Defining minimum levels in this standard for all existing occupancies is contrary to the risk assessment process. In response to the submitter's concern about this standard having vague or unenforceable requirements because there is no specific methodology, there are documents and national resources available that provide a methodology to perform a community risk assessment.

Public Comment No. 3-NFPA 1730-2017 [Section No. 6.7.2]

6.7.2 *

~~In the absence of a community risk assessment, existing~~ Existing occupancy fire prevention inspection and code enforcement inspection frequencies shall be not less than those specified in Table 6.7.2.

Table 6.7.2 Minimum Inspection Frequency

Occupancy Risk Classification	Frequency
High	Annually
Moderate	Biennially
Low	Triennially
Critical infrastructure	Per AHJ

Statement of Problem and Substantiation for Public Comment

If the CRA language from FR-2 is going to remain in the standard, then this section should be revised to establish minimums. Without a clear methodology specified by the TC to establish existing occupancy fire inspection frequencies utilizing CRA, the standard should still maintain a minimum frequency as specified in the table. If a locally developed methodology is developed which establishes a greater inspection frequency, then a greater frequency of inspection can occur at the option of the AHJ. However, the much greater risk here is that without an evidence based methodology promulgated in the standard, any inspection frequency can currently be justified based on just opinion, and not evidence. I could conduct a CRA and justify the inspection of existing unsprinklered assembly occupancies should occur once every 15 years and I would be compliant with the standard, even though there is no technical justification for the inspection frequency I just picked.

In addition, without a standard based methodology, any existing fire inspection frequency generated by CRA would be unjustifiable to policy makers, the public or internal staff. Answering the question posed by a Finance Director or City Manger of: "What accepted industry practice methodology did you utilize?" would result in an honest answer of "None, as none exists." That answer completely compromises the entire credibility of the CRA process. Therefore, until a standard methodology can be produced in NFPA 1730 or NFPA 1300, the standard should remain with the minimums in the table that can be exceeded based on justification by a locally developed CRA, but not reduced below the table specified frequencies. This PI accomplishes that objective and maintains the integrity of the CRA approach.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 1-NFPA 1730-2017 [Section No. 6.7]	Similar topic related to existing occupancy fire inspection frequencies developed under a CRA
Public Comment No. 2-NFPA 1730-2017 [New Section after A.6.6]	Similar topic related to existing occupancy fire inspection frequencies developed under a CRA
Public Comment No. 1-NFPA 1730-2017 [Section No. 6.7]	
Public Comment No. 2-NFPA 1730-2017 [New Section after A.6.6]	

Related Item

First Revision No. 2-NFPA 1730-2016 [Section No. 6.7]

Submitter Information Verification

Submitter Full Name: Anthony Apfelbeck

Organization: Altamonte Springs Building/Fire Safety Division
Street Address:
City:
State:
Zip:
Submittal Date: Tue Feb 28 14:49:02 EST 2017

Committee Statement

Committee Action: Rejected

Resolution: Communities that are struggling for resources may not be able to meet the minimum inspection frequencies. Additionally, the priorities identified in a Community Risk Assessment may allow less frequent inspections than those in the Minimum Inspection Frequency table. The proposed language restricts these communities from modifying inspection frequencies based on the actual Community Risk Assessment. There are documents and national resources available that provide a methodology to perform a Community Risk Assessment.

Public Comment No. 6-NFPA 1730-2017 [New Section after A.4.7.1]

TITLE OF NEW CONTENT

Step 6. When an FPO has 4 or more full-time personnel, a dedicated supervisory position should be added.

Statement of Problem and Substantiation for Public Comment

Adequate supervision is will be necessary when an FPO reaches a certain size. For instance, somebody will be needed to maintain the records and the data required in this section. Although it does not necessarily require a fire prevention person, the benefits of having a trained fire prevention person will facilitate changes in operations when adjusting for changes in occupancies or hazards or training and supervising new FPO personnel due to increases in services levels, retirements, transfers, etc. This is the level used by the Department of Defense (DOD Instruction number 6055.6, Fire and Emergency Services Program (F&ES), dated December 21, 2006, Enclosure 9, pp 34-35.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 8-NFPA 1730-2017 [New Section after A.4.7.1]	

Related Item

Personnel

Submitter Information Verification

Submitter Full Name: Douglas Warsinski
Organization: Vigilant Inspections
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 10 07:50:25 EDT 2017

Committee Statement

Committee Action: Rejected but held

Resolution: The Technical Committee agrees that supervision is necessary regardless of the size of the Fire Prevention Organization. However, to fully incorporate this proposal into all areas of the document is considered new material at this time. The Technical Committee would like to consider this for the next revision cycle.

Public Comment No. 8-NFPA 1730-2017 [New Section after A.4.7.1]

TITLE OF NEW CONTENT

A.4.7.1(e)

For departments without dedicated fire prevention personnel, the square footage method may be utilized to determine a "baseline" level of full-time personnel. Determine the total square footage of property being inspected annually by occupancy risk and frequency in accordance with table 6.7.2 and apply the following:

Area requiring Fire Prevention Surveys (in thousands of square feet) = prevention personnel required*:

< 1,000 = 1

> 1,000 and < 3,000 = 2

> 3,000 and < 5,000 = 3

> 5,000 and < 8,000 = 4

> 8,000 and < 11,000 = 5

> 11,000 and < 14,000 = 6

> 14,000 and < 17,000 = 7

> 17,000 and < 20,000 = 8

> 20,000 = use section A.4.7.1

* may be increased or decreased depending section A.4.7.1

Statement of Problem and Substantiation for Public Comment

I can offer anecdotal evidence as an Insurance Loss Control consultant working in Michigan, Ohio, and Indiana that the trend in urban sprawl in rural areas is continuing not only in residential but also commercial and industrial occupancies. Larger and more complex occupancies are moving to these areas for a variety of reasons such as tax favorability and availability of land. Many of these growing communities are transitioning to combination departments, adding some full-time personnel as well as increased EMS activities. I have found that occupancies in these areas are not as well served from a fire prevention standpoint as in their adjacent cities.

According to the Third Needs Assessment of the U.S. Fire Service, June 2011, NFPA, 24 percent of fire departments do not conduct routine inspections. (the Fourth Assessment of the U.S. Fire Service, June 2011, did not specifically ask this question). According to the U.S. Fire Department Profile 2015, NFPA, there are 5,421 were mostly volunteer protecting 16 percent of the population.

During my 10-year municipal fire prevention career, I have utilized the process outlined in section A.4.7.1 that I found in the Ontario Fire Marshal's Fire Safety Effectiveness Model. It was a difficult task to keep up with. I believe it will be hard for departments with few career members to accomplish just as it is hard for company members to perform more complex inspections. I would therefore suggest an approach that I have utilized in my part-time military public safety career. This is derived from Federal guidelines outlined in the Department of Defense Instruction Number 6055.6, DD Fire and Emergency Services (F&ES) Program, dated December 21, 2006, Enclosure 9, pp 34-35.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 6-NFPA 1730-2017 [New Section after A.4.7.1]	

Related Item

Staffing

Submitter Information Verification

Submitter Full Name: Douglas Warsinski
Organization: Vigilant Inspections
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 10 08:42:39 EDT 2017

Committee Statement

Committee Action: Rejected
Resolution: In the development of this document there was extensive discussion and task group work on this topic. The proposed language draws no distinction between different occupancy types or hazard levels. The numbers proposed are arbitrary and lack empirical data.

Public Comment No. 2-NFPA 1730-2017 [New Section after A.6.6]

Insert a new A.6.7.1

A.6.7.1 The methodology for determining an existing occupancy fire inspection frequency schedule utilizing a Community Risk Assessment is:

(TC to insert methodology for determining existing occupancy fire inspection frequency schedule based on a CRA.)

Statement of Problem and Substantiation for Public Comment

The new language in 6.7.1 from FR-2 states that a Community Risk Assessment shall be used to establish minimum inspection frequencies. Since the TC has specific this is the preferred method to establish minimum inspection frequencies, the TC needs to also specify the methodology to conduct such analysis. The author of this PI attempted to find such a methodology by requesting it be provided on EParade, researching numerous CRA/CRR documents and looking at existing CRAs/CRRs and was unable to find any language addressing how to conduct this assessment. Therefore, this methodology needs to be provided by the TC if the TC is going to endorse such an approach with regards to establishing existing occupancy fire inspection frequencies.

Without such guidance in NFPA 1730 or NFPA 1300, the current FR language would result in completely different minimum inspection frequencies being developed by different users even if they were confronted with the exactly same risk data. This lack of guidance to a data driven methodology fails to serve the user, the public nor our policy makers. It is also a violation of numerous sections of the NFPA Manual of Style including sections 2.2.2.1, 2.2.3.1 and 2.2.3.2.

Section 2.2.2.1 of the MOS states that "The main text of codes and standards shall not contain references or requirements that are unenforceable and vague." The current FR language directing the user to conduct a CRA in order to establish minimum inspection frequencies, without a methodology or direction on how to accomplish that objective, is about as vague as one can get.

Section 2.2.3.1 of the MOS states that "Codes and standards shall state specific criteria that minimizes judgment by the users." The current FR language does not provide any specific criteria on how to develop a CRA with minimum inspection frequencies. Without a methodology or guidance by NFPA 1730 or NFPA 1300, the currently language accomplishes nothing except maximizing the judgment by the users. This is completely contrary to the MOS direction.

Section 2.2.3.2 of the MOS states that "Multiple levels of safety shall not be used in any code or standard." The current FR language creates a situation where multiple levels of safety will be employed. As stated above, without a standard methodology to develop an existing occupancy inspection frequency, users will be left to develop their own. This would result in the situation where 10 users could be confronted with the exact same data and develop 10 radically different inspection frequencies. Each of these differing inspection frequencies would create a different level of safety based on the direction in the standard. This is contrary to the MOS.

Once either the NFPA 1730 document or the NFPA 1300 document evolves to develop a standard methodology for users to create consistent existing occupancy fire inspection frequencies based on the data, the FR language would be appropriate. Until then, we need to return to the original language prior to the FR.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 1-NFPA 1730-2017 [Section No. 6.7]	Similar topic relating to establishing existing occupany inspection frequencies via CRA
Public Comment No. 3-NFPA 1730-2017 [Section No. 6.7.2]	Similar topic relating to establishing existing occupancy inspection frequencies via CRA

Related Item

First Revision No. 2-NFPA 1730-2016 [Section No. 6.7]

Submitter Information Verification

Submitter Full Name: Anthony Apfelbeck

Organization: Altamonte Springs Building/Fire Safety Division

Street Address:

City:

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Zip:

Submittal Date: Tue Feb 28 14:20:50 EST 2017

Committee Statement

Committee Action: Rejected

Resolution: The submitter requests the Technical Committee to insert a methodology that is considered new material. There are documents and national resources available that provide a methodology to perform a Community Risk Assessment. Additionally, there are new technologies and documents constantly in development in relation to Community Risk Assessment development, and the Technical Committee does not want to restrict future innovation on Community Risk Assessment processes. Defining one in this document may not reflect the risk(s) in all users' communities.