



NATIONAL FIRE PROTECTION ASSOCIATION

The leading information and knowledge resource on fire, electrical and related hazards

MEMORANDUM

TO: Technical Committee on Chimneys, Fireplaces, and Venting Systems for Heat-Producing Appliances

FROM: Sarah Caldwell, *Committee Administrator*

DATE: July 10, 2023

SUBJECT: NFPA 211 Proposed Tentative Interim Amendment No. 1733
Public Comment Review

The attached Public Comments are being submitted to the Technical Committee for review.

If you wish to change your vote, the change must be submitted through the NFPA online ballot system at the following link: [NFPA Ballot Link](#). If you do not wish to change your vote, no response is necessary.

Please complete the ballot on or before **July 14, 2023 by 11:59PM (ET)**.

While completing your ballot, please remember the following:

- **A comment is required for both Question No. 1 and Question No. 2 for the online TIA ballot. Comments must accompany all Negative, Abstaining and Agree votes.**
- **If you vote “Agree” on Question 1, simply add “Agree” to the comment field and if you vote “Agree” on Question 2, insert the applicable letter(s) selections in the comment field which can be found in the Instructions box on the ballot site.**

You must hit SUBMIT to SAVE your work. **Note:** the system session will time you out after 45 minutes; any work not submitted at that time will not be saved! You may return to finish or change your ballot at any time up to the closing date. Ballot comments exceeding 4,000 characters must be submitted in a Word document via email, to Sarah Caldwell at scaldwell@nfpa.org.

The return of ballots is required by the *Regulations Governing the Development of NFPA Standards*.

Attachment: Public Comment(s)

NFPA 211-Proposed 2024 Edition

Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances

Log No.: 1733

Reference: 15.4.2.4

TIA Comment Closing Date: July 6, 2023

Submitter: Robert Harper, Hearthman Specialties

www.nfpa.org/211

1. Delete paragraph 15.4.2.4 as follows:

~~15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected.~~

Substantiation: The National Fire Protection Association is "...devoted to eliminating death, injury, property and economic loss due to fire, electrical and related hazards." Further, the "NFPA 211 reduces fire hazards by ensuring the safe removal of flue gases, the proper installation of solid fuel-burning appliances, and the correct construction and installation of chimneys, fireplaces, and venting systems." This request for TIA is made as a proposed revision in the 2024 Standard 211 is counter intuitive to the mission of the NFPA and the 211 Standard.

For more than 20 years the chimney service industry has reduced loss through complete and accurate chimney and venting system inspection utilizing chapters 14 & 15 of the NFPA 211 as the industry standard for inspection. The true extent and scope of prevented losses cannot be measured, as the losses did not occur.

A revision in the Chapter 15 of the 2024 Standard 211 stands to create and result in the real potential of increased loss, as the standard will now limit inspection scope. In short, the standard will no longer require inspection of certain chimney components critical to safety. The revision consists of an added subsection in section 15.4 of Chapter 15. This new subsection for inclusion in the 2024 Standard 211 is as follows:

- *"15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected"*

As written, the language in the new subsection, 15.4.2.4, presents multiple concerns, including to homeowners, the chimney service industry and chimney service professional's ability to prevent loss. By specifying that less of the chimney system is required to be inspected during a Level 2 Inspection, less of the chimney system will be inspected. By inspecting less, a very natural result will be loss. While it can't yet be predicted, calculated or measured, resulting losses that are a direct result of less of an inspection scope, can be categorized as losses that were potentially preventable through the scope of the Inspection chapter of the Standard as it's been written and utilized for over 20 years.

By not requiring inspection of all enclosed flues, and allowing the client to request and determine the scope, 3 of the resulting very real concerns include the following:

1. Many chimney service professionals that inspect chimneys also perform repairs to those systems. Where the professional does not perform repairs, there is still a recommendation provided to the client to have certain repairs performed. Many chimney repairs to one flue in a multi-flue chimney, will impact additional flues in that same chimney. The condition and/or installation method of additional flues in the same chimney often also affect repairs and repair recommendations. Not having necessary information on the condition and installation methods of adjacent flues may result in insufficient repairs, damage to uninspected flues and/or unmitigated hazards in the system.
2. When allowing the client to request that only certain flues are inspected, hazards may again go unmitigated. For a variety of reasons a client may believe that their additional flue or flues are free of deficiencies. When in reality, and in many cases, deficiencies and hazards are present, and the client is simply unaware of the actual condition of an additional flue. An opportunity to prevent loss is waived by the client and missed, making the client assume the role of chimney service professional, while lacking the education and training that backs the chimney service trade.
3. Limiting the examination of additional flues to only those requested by the client, is in stark contrast to the inspection chapter requirements of the Standard as written for the last 20+ years. This results in an increased liability to the chimney service professional, as the Standard would now “allow” and even direct the professional to complete less, when they previously always completed more, as specified by the Standard. At the same time, the inspection chapter of the 2024 Standard would now provide new language that is in conflict with existing language that is not changing, resulting in the burden on the professional to make interpretations which may or may not be in compliance with the intent of the Standard.

I have agonized and studied the current proposal and have concluded this section change simply represents too much opportunity for abuse, misuse, missed safety issues and a reduction in the general fire and life safety assurance intended by model codes and standards.

To illustrate this intent of model codes, in addition to the NFPA mission statement above, I will reference the **International Residential Code, R101.3 Intent**. *“The purpose of this code is to establish minimum requirements to safeguard the public safety, health and general welfare through affordability, structural strength, means of egress facilities, stability, sanitation, light and ventilation, energy conservation and safety to life and property from fire and other hazards attributed to the built environment and to provide safety to fire fighters and emergency responders during emergency operations.*

**The intent of the code is to establish regulations providing for safety, health, and general welfare of building occupants, as well as for fire fighters and emergency responders during building emergencies. The intent becomes important in the application of such sections as Sections R102, R104, and R113, as well as any enforcement-oriented interpretive action or judgement. Like any code, the written text is subject to interpretation. Interpretations should not be affected by economics or the potential impact on any party. The only considerations should be occupants’ safety, protection of occupants health and welfare, and emergency responder safety.”*

While NFPA 211 in and of itself is not a model building code but a standard, it is referenced in most model building codes and virtually every combustion appliance’s installation instructions.

To water down or soften 211 is to do the same to the adopting model codes and possibly to the listed instructions of combustion equipment.

When the circumstances of a Level II inspection are examined, it becomes readily apparent one of the main applications is for real estate sale or transfer. Should level II inspections be allowed to deliberately skip relevant, often critical aspects of any individual chimney, the net effect is to reduce the public trust and welfare. As the Standard stands, there has not been a viable means of separating selected portions of a chimney to the total exclusion of the whole without inherently missing critical elements.

In short, to exclude one or more flues in a single chimney is to perform a partial inspection. There is no honest way to assure the client that chimney does not present a reasonable degree of risk from harm, structural compromise, show signs of significant wear, deterioration, or damage that could result soon in either some type of failure of the chimney to perform its functions, or other occult signs or damage. Significant signs of failure or impending failure may be present only in the section excluded. This allows for an inspector to provide a false sense of security to the client. It also fails the public trust as noted above.

I have personally seen many times where I was called for a level II inspection with the intent to examine just one flue in a chimney where visualization of the adjacent flue revealed major breeches and failure that were significant and relevant to the flue of primary concern. One example is where a heater flue was relined with a metallic flexible liner around the smoke chamber of a fireplace. The wythe wall separating the fireplace smoke chamber from the heater flue was inadequate and breached resulting in a large gap that allowed byproducts of combustion to enter the concentric space around the heater liner in a space inaccessible for inspection or cleaning and unapproved for venting. Another is where visualization of one flue reveals a metallic liner visible across the open mortar joints of both flues, which is unacceptable. This would be missed by inspecting the one instead of the whole.

One analogy to this concept might be to equate this proposal to allowing patients to dictate to doctors what tests to run and what items on a physical examination to perform. Who is the expert here?

Another case could be where a seller is aware of a hidden or occult defect in one flue and lures the buyer into accepting a partial inspection to avoid costly repairs or possibly endangering the sale.

Once a partial inspection has been reported, there is a high probability someone will mistake or misuse the report as comprehensive and refer to the whole chimney as “having passed inspection”. Thereafter, decisions may be made based upon faulty information inferred from the news of a professional inspection. These partial inspections can be used to form the basis of a decision on the suitability, fire worthiness and durability of a chimney even though one or more flues may have been excluded. There is no reasonable way to mark said flues as being uninspected and therefore should not be assumed or inferred as suitable for a particular application.

Note the Standard still does include inspecting the smoke chamber, fire chamber and other aspects of the chimney. The change simply allows for the exclusion of selected “flues”. How does an inspector comment on a smoke chamber but not the attached flue?

The desire to limit inspections does carry basis in the additional time, writing, and economic costs to include all flues. There is also a question as to how one can separate liability in such an instance. Since the inspection of all attached flues has been in existence for 20 years, it has become the **Standard of Care**.

We have to ask ourselves who benefits from this reduction in care? The client? Those who would have cause to enter the property? The inspector? Where does the public trust and public good lie? I think that is unresolved in this matter.

Therefore, we need to consider that other stakeholders were not part of this process and may not have been made aware that our changes affect their standards and manufacturers installation instruction manuals. Perhaps we should contact more stakeholders for public comment before proceeding. It just seems we may have disenfranchised a segment of the market.

In short, I think this issue was rushed and needs more study and debate. There may be a way to separate sub-units of a chimney but as it stands, I think this is premature. I ask that a TIA be granted so the Appeals committee can study the matter further. -BH

As indicated, this request for a TIA is for the deletion of 15.4.2.4 in the 2024 Standard 211

Emergency Nature: The NFPA Standard contains a conflict within the NFPA Standards or within another NFPA Standard. The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation. The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process or was without adequate technical (safety) justification of the action.

If the 2024 Edition of the NFPA 211 is published without the requested TIA and deletion, the Emergency Nature includes multiple characteristics, the most critical being an immediate risk to the public and public safety. Without the TIA and deletion, the 2024 Standard 211 will require less scope during the course of Level 2 Chimney Inspection, and less scope during inspection will result in less hazards detected, with less hazards detected resulting in an as yet incalculable but equally inevitable increase in loss. An additional characteristic that is of an emergency nature is the conflict created for the Chimney Service Professional and others performing Level 2 Chimney Inspections. Publication of the 2024 Standard 211 without the TIA and deletion will result in a standard with direct conflicts within chapter 15, and with a specification to perform less than what has been required by the standard for more than 20 years. We need to ensure the Standard provides a reasonable degree of safety from risks of hazards, both known and that may be uncovered by a comprehensive inspection. Weakening any Standard may result in increased risk to the public and a dilution of the intent of having a Standard. See supporting letter from 211 Cmte. Member Eric Adair. -BH

Foran, Rosanne

**Comment No. 1
SUPPORT**

From: Joshua Brosius
Sent: Wednesday, May 24, 2023 1:00 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

Comment on Proposed TIA 1733 on NFPA 211

To whom it may concern:

I strongly support omitting the newly proposed 15.4.2.4 from the NFPA 211 as recommended by Robert Harper as our experience has also been that the requirement to inspect all enclosed flues within the structure has uncovered deficiencies that would have otherwise been concealed from the view within the requested flue only using even the most advanced industry equipment. Changing this 20 year standard to inspect all of the flues would be a mistake and could potentially lead to missed findings that could have prevented the type of loss and harm that the NFPA is designed to prevent.

Thank you for your consideration.

RE:

NFPA 211-Proposed 2024 Edition

Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances

Log No.: 1733

Reference: 15.4.2.4

TIA Comment Closing Date: July 6, 2023 Submitter: Robert Harper, Hearthman Specialties

Thank you,

Joshua Brosius

Always A Sweep: Chimney and Dryer Vent Service, LLC and Always Home Repair

Certified Master Chimney Technician #34

& Certified Chimney Professional #546

Certified Chimney Reliner #94

Certified Dryer Exhaust Technician (CSIA) #1149

Certified Chimney Specialist (CSIA) #59

Certified Chimney Sweep (CSIA) #10020

Certified Hearth Design Specialist and Certified Fireplace Installer (National Fireplace Institute) #177069

Licensed HeatShield Installer

“It takes less time to do a thing right, than it does to explain why you did it wrong.” – Longfellow

Foran, Rosanne

Comment No. 2
SUPPORT

From:
Sent: Tuesday, May 30, 2023 11:03 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

Hello, I am a second generation sweep and I support TIA 1733. Public safety is our priority and allowing a customer to limit what we are allowed to inspect seems shortsighted. A fire is being lit in the home and heat doesn't contain itself to 1 flue, it radiates. A thorough examination of the entire system is the only way to guarantee continued use.

Zach Williams

Sent from my iPhone

Foran, Rosanne

Comment No. 3
SUPPORT

From: Pinckletink Chimney Service LLC
Sent: Wednesday, May 31, 2023 3:07 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern at the NFPA;

I, Jessica Marking, the Head of Operations, the owner, Benjamin Marking, and all of Pinckletink Chimney Service LLC, of Mechanic Falls, ME believe that it is imperative that you heed Proposed TIA No. 1733 and DELETE paragraph 15.4.2.4 from the 2024 NFPA 211. Not only does it leave many openings for missed safety issues for the customer, but that leaves inspectors and repairers with less than the needed information on the chimney for what they need to do. Customers do not know much, if anything, about chimneys, so letting them decide on the scope of inspection, as it pertains to which flues should be evaluated, is a hazard in and of itself, as it is taking it out of the hands of the professionals. Please delete paragraph 15.4.2.4 from the 2024 NFPA 211.

Thank you,

Jessica

Pinckletink Chimney Service LLC
Benjamin Marking, Owner
Jessica Marking, Authorized Representative/Head of Operations
121 Elm St. Mechanic Falls, Me 04256

www.facebook.com/PinckletinkChimneySvc

Foran, Rosanne

Comment No. 4
SUPPORT
w/comment

From: Raymond Gessner
Sent: Friday, May 26, 2023 10:02 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

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“15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected”

To

15.4.2.4: if the client requests inspection of specific chimney flues then notification in writing on report shall state: “Other flues require inspection per NFPA 211: 15.4.2.3”

This releases contractor from liability of not inspecting the other flues and educates home owners that other flues require inspection.

Ray Gessner, P.E.

Foran, Rosanne

Comment No. 5
SUPPORT
 page 1 of 4

From: Daniel Freeman
Sent: Tuesday, June 13, 2023 3:36 PM
To: Foran, Rosanne
Subject: Re: FW: Comment on Proposed TIA 1733 on NFPA 211

I do. Let me know if this came through better formatted. I am traveling so had to adapt on my ipad. Thank you.

To: Secretary, Standards Council,

RE: TIA SUPPORT COMMENT

Date: 6/13/2023

To whom it may concern,

My name is Daniel Freeman. I am a Lead Inspector at The Chimney Doctor, Ltd., as well as the Lead Investigator at Freeman Fire Inspectors LLC. We are based in Grand Junction, CO. I am submitting this request on behalf of myself, my companies, and the many individuals in our industry who may be affected by this change without realizing the negative impact it will have long term.

I SUPPORT THE TIA.

Currently I sit on two Standards Technical Panels (STPs) with Underwriters Laboratories (UL) covering 17 testing standards related to heating appliances, chimneys, and vents. I also hold the following certifications and designations or am part of the following organizations:

- International Association of Arson Investigators (IAAI)
 - Fire Investigation Technician (IAAI-FIT) 10/27/2021-10/27/2024
- National Association of Fire Investigators (NAFI) Member #26681
- F.I.R.E. Certified Fireplace & Chimney Inspector FCI-338, 8/28/2021-8/28/2024
- National Fireplace Institute
 - NFI Certified Instructor 5/2021-Present
 - NFI Certified Master Hearth Professional #175637 3/11/2019-12/31/2024
 - NFI Certified Pellet Specialist 3/11/2019-12/31/2024
 - NFI Certified Gas Specialist 8/17/2018-12/31/2024
 - NFI Certified Woodburning Specialist 8/16/2018-12/31/2024
- National Chimney Sweep Guild
 - Certified Master Chimney Professional #TBD - 6/1/2023-6/1/2025
 - Certified Master Chimney Technician #225 - 7/31/2021-7/31/2023
 - Certified Chimney Professional #583 - 4/25/2018-4/24/2020, 10/2020-10/2022
 - Certified Chimney Reliner #104 - 4/26/2018-4/25/2020, 10/2020-10/2022
- Chimney Safety Institute of America (CSIA)
 - CSIA Certified Chimney Specialist #41 - 5/17/2021-3/31/2026
 - CSIA Certified Chimney Sweep #9430 - 3/31/2017-3/31/2026
 - Certified Dryer Exhaust Technician (C-DET) #1137 - 5/2018-5/2024
- International Code Council (ICC) Member #9688396
 - ICC Certified Residential Mechanical Inspector (M-1) - 5/25/21-05/24/2024
 - ICC G29 Master Mechanical Exam 11/14/2022
 - ICC G12 General Contractor Class B Exam 10/9/2021

The National Fire Protection Association is "...devoted to eliminating death, injury, property and economic loss due to fire, electrical and related hazards."

Further, the "NFPA 211 reduces fire hazards by ensuring the safe removal of flue gases, the proper installation of solid fuel-burning appliances, and the correct construction and installation of chimneys, fireplaces, and venting systems."

The 211 Committee proposed and accepted a change to the 211 Standard that counters the mission of the NFPA and the 211 Standard. I commented against several changes to the standard during the commenting period.

For more than 20 years the chimney service industry has reduced loss through complete and accurate chimney and venting system inspection utilizing chapters 14 & 15 of the NFPA 211 as the industry standard for inspection. The true extent and scope of prevented losses cannot be measured, as the losses did not occur.

The 211 Committee proposed and accepted changes to Chapter 15 that may create and result in the real potential of increased loss, as the standard will now limit inspection scope in ways that may give a consumer the impression that a chimney or system is "safe" to use when a thorough evaluation of the chimney and all connected flues and appliances has not been completed. In short, the standard will no longer require inspection of certain chimney components critical to the safety of the overall system.

2019 NFPA Standard 211

Chapter 15 Inspection of Existing Chimneys

15.4 Level II Inspections

15.4.2 Scope and Access

15.4.2.3 "The inspection shall include examination of accessible areas of all chimney flues and the internal surfaces of all flue liners incorporated within the chimney with video scanning equipment or other means used as necessary to observe those areas".

The **15.4.2.3** language will remain largely intact in the new version, with a new subsection immediately following.

The specific section, subsection and scope that presents the very real concern is as follows:

This new subsection for inclusion in the 2024 Standard 211 is as follows:

- *"15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected"*

As written, the language in the new subsection, **15.4.2.4**, presents multiple concerns;

1. **To homeowners** as this will place them at greater risk of loss. Until a thorough and complete inspection has been performed including all flues and flue liners within the structure at hand the suitability of the system for continued use cannot be guaranteed (in this case the entire masonry structure and all flues contained therein as one flue can have major impact on the safety of other flues in the system).
2. **To the chimney service industry and chimney service professionals** at large this change will reduce their ability to prevent loss. Adding this disclaimer effectively removes the requirement to encourage the industry to perform the required higher level of inspection. By specifying that less of the chimney system is required to be inspected during a Level 2 Inspection simply because a homeowner does not request it, less of the chimney system will be inspected. By inspecting less, deficiencies linked

to loss will be missed. While it can't yet be predicted, calculated or measured, resulting losses that are a direct result of an inspection being performed to a level less than the standard, can be categorized as losses that were potentially preventable through the scope of the Inspection chapter of the Standard as it's been written and utilized for over 20 years.

By not requiring inspection of all enclosed flues, and allowing the client to request and determine the scope, this resulting very real concerns include the following:

1. Many chimney service professionals that inspect chimneys also perform repairs to those systems. Where the professional does not perform repairs, there is still a recommendation provided to the client to have certain repairs performed. Many chimney repairs to one flue in a multi-flue chimney, will impact additional flues in that same chimney. The condition and/or installation method of additional flues in the same chimney often also affect repairs and repair recommendations. Not having necessary information on the condition and installation methods of adjacent flues may result in insufficient repairs, damage to uninspected flues and/or unmitigated hazards in the system.
2. Prior to relining a chimney or the installation of an appliance of a different size, type or heat output a Level II inspection shall be performed... and yet we are giving license for the homeowner to request that prior to installing a new or upgraded heating appliance installers do not perform their due diligence and perform the higher inspection. While individual installers and companies may take the higher road and follow industry best practices as has been taught for the last 20 years this exception introduces uncertainty into the requirement to perform the inspection prior to these requirements. Essentially, if the homeowner doesn't request it then it won't need to be performed, even though the inspection (including all flues contained within the structure) is at times fundamental to the suitability of the system to house the selected appliance or have the selected repair completed.
3. When allowing the client to request that only certain flues are inspected, hazards may again go unmitigated and incomplete inspections not only abound but be codified in the standard. For a variety of reasons a client may believe that their additional flue or flues are free of deficiencies. When in reality, and in many cases, deficiencies and hazards are present, and the client is simply unaware of the actual condition of an additional flue. An opportunity to prevent loss is waived by the client and missed, making the client assume the role of chimney service professional, while lacking the education and training necessary to make an informed decision. Then, lacking the required information the chimney professional cannot make proper recommendations or verify the suitability of the system for continued use.
4. Limiting the examination of additional flues to only those requested by the client, is in stark contrast to the inspection chapter requirements of the Standard as written for the last 20+ years. This change results in an increased liability to the chimney service professional, as the Standard would now "allow" the professional to do less, when they previously always did more, as specified by the Standard. At the same time, the inspection chapter of the Standard provides new language that is in conflict with existing language that is not changing, resulting in the burden on the professional to make interpretations which may or may not be in compliance with the intent of the Standard.
5. Additionally a newly proposed **15.4.2.5** will state, "Where multiple factory built fireplaces or chimneys are installed in a common structure or chase, the inspector shall not be required to inspect more than the system(s) requested to be inspected by the inspector's client." This new section already addresses the possibility that there will be areas that an inspector cannot gain access to where shared dwelling units exist or where the homeowner does not control the property surrounding portions of a shared structure or chase.
 - a. Being that this is potentially already addressed with the proposed addition of **15.4.2.5** the text in **15.4.2.4** is unnecessary and only decreases the value of a full Level II inspection. Without inspection and "examination of accessible areas of all chimney flues and the internal surfaces of all flue liners incorporated within the chimney with image scanning equipment or other means used as necessary to observe those areas" (**15.4.2.3**) we will be 'dumbing down' or 'watering

down' what a full and complete Level II inspection includes. Without inspecting these spaces one cannot say that they completed a full Level II inspection at this time. This change would allow individuals limiting their inspection to state they are completing a Level II inspection while leaving out required portions of the Level II inspection requirements.

The inspection requirements as written in the standard should speak to industry best practices, remove ambiguity, and require only the highest level of inspection and professionalism. Making the change as outlined will have the opposite effect.

The answer to this problem isn't

- 1) to lower the standard of care we are required to complete, or
- 2) to give inspectors 'outs' so they don't have to live up to the requirements of industry best practices as communicated in the standard,

but rather,

- 3) focus on increasing educational outreach and the requirement of local governments and Authorities Having Jurisdiction (AHJ) for inspectors, installers, and chimney service technicians to be certified, licensed, and well educated.

We need not provide an "out" to allow inspectors and installers to perform to less than the highest quality standard. Many companies and individuals within our industry already meet and teach others how to exceed these inspection requirements. The result are better informed consumers who understand the risks associated with using an appliance that does not meet applicable minimum standards. This exception only adds ambiguity to what a complete and thorough inspection should include, who determines what is the industry standard, and otherwise turns a clear subject into something confusing that will not help our industry as a whole.

Conclusion

I SUPPORT THE TIA and oppose the addition of the subsection proposed and accepted by the 211 Committee "15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected". I request that this new subsection (15.4.2.4) be removed from the 2024 edition of the NFPA 211, the Standard for Chimneys, Fireplaces, Vents and Solid Fuel-Burning Appliances.

By removing subsection 15.4.2.4, the chimney service industry and chimney professionals nationwide will be able to continue to play a vital role in loss prevention through complete and accurate chimney inspections.

Thank you for your attention to and consideration of this matter of loss prevention. Should you have any questions please feel free to respond to this email or call at 970-644-1172.

Sincerely,

Daniel Freeman
Lead Inspector
The Chimney Doctor, Ltd
2944 I-70 Business Loop #210, Grand Junction, CO 81501

IAAI-FIT Fire Investigation Technician
F.I.R.E. Certified Fireplace & Chimney Inspector FCI-338
NFI Certified Instructor / Master Hearth Professional #176537
NCSG Certified Master Chimney Professional #225
ICC Certified Residential Mechanical Inspector #9688396, Class B & Master Mechanical Contractor
CSIA Certified Chimney Specialist #41, Sweep #9430

C-DET Certified Dryer Exhaust Technician #1137
HeatShield Factory Trained Installer

Foran, Rosanne

Comment No. 6
SUPPORT

From: Fletcher Chimney
Sent: Wednesday, June 14, 2023 6:06 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

I support TIA 1733. As a chimney professional and inspector I am greatly concerned about the proposed changes to the inspection requirements. I feel it is my duty to do a complete inspection, which to me means inspecting all the flues in the chimney system. After each inspection I spend long periods of time with the customer going over defects and general education of chimneys. That education often includes explaining how many flues they have and what each one is servicing. I often find people do not know they even had multiple flues or that their gas appliances were even venting into the chimney. How can we let someone with no knowledge of their chimney decide what needs to be inspected?

Jim Fletcher
Fletcher Chimney Service LLC

Foran, Rosanne

**Comment No. 7
SUPPORT**

From: Shared TIAs
Subject: FW: Comment on Proposed TIA 1733 on NFPA 211

From: JOHN SHATNEY
Sent: Tuesday, May 30, 2023 3:00 PM
To: Shared TIAs <STIAs@nfpa.org>
Subject: Comment on Proposed TIA 1733 on NFPA 211

Good afternoon,

I just wanted to comment on this TIA and re-affirm what has already been stated. Specifically:

"This revision in the Chapter 15 of the 2024 Standard 211 stands to create and result in the real potential of increased loss, as the standard will now limit inspection scope."

I've been in the chimney and hearth industry now for 8 years and done hundreds of inspections. Frequently inspecting one flue reveals issues in an adjacent flue that could not have been seen otherwise. It would be absolutely foolish to not inspect all the flues in a chimney when making changes/repairs to another flue. We have many times found openings between flues where one flue has been lined, but the other flue is still cross venting into the lined flue causing products of combustion (heat/smoke/water vapor) to be trapped in the other flue.

In addition, I do not understand how the changes to the standard deal with level 2 inspection of a chimney that has multiple flues and multiple fireplaces/appliances. Do we inspect the fireplaces/appliances, but ignore the flues unless the customer asks us specifically to look at them? This is not consistent with the table in 15.2.1. As far as I am aware, the table is not being changed so how does the inspector know which to follow? I would assume the more restrictive wording, which would be in the table requiring all flues to be inspected.

The change in 15.4.2.4 really does not benefit anyone, especially the homeowner. The industry standard of care for over 20 years has been the inspection of all flues and in order to maintain the integrity of our industry and the safety of the homeowner and their property, it should not be changed.

Thank you for your time.

John Shatney

Operations Manager

Chimney Cricket, Inc.

101 State Road
Media, PA 19063

F.I.R.E. Certified Fireplace & Chimney Inspector
CSIA Certified Chimney Sweep
Certified Master Chimney Technician
NFI Certified Hearth Design Specialist
NFI Certified Woodburning Specialist
Big Green Egg Certified EGGspert ®
Certified OSHA 10 hour Construction Safety

Foran, Rosanne

Comment No. 8
SUPPORT

From: Fireside Sweeps LLC
Sent: Sunday, June 25, 2023 7:58 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

I believe that the current proposed wording needs to be re-addressed

☒ “15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected”

With the chimneys here in the north east if you do not inspect the rest of the chimney you are putting your home owner at risk and you are also letting yourself open to possible litigation on things you could not see due to the limitations of the home owner stating "no you can not look at this"

This issue is not about the people that did the work on this committee it is about the public and allowing us to do our job like its has been done over the past 20 years.

I also feel this opens us the chimney inspections-sweep industry open to liability issues.

Steven T Scally

Fireside Sweeps LLC Fremont NH

Master Sweep

Foran, Rosanne

Comment No. 9
SUPPORT
page 1 of 6

From: Michael Segerstrom
Sent: Friday, June 30, 2023 10:27 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

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To: NFPA Standards Council

RE: NFPA 211 TIA 1733

Date: June 30, 2023

Robert Harper, a member of the NFPA 211 Technical Committee has requested a TIA for the 2024 edition of the 211 Standard as follows:

TIA 1733 requests deletion of section 15.4.2.4:

~~15.4.2.4 the requirement to inspect all chimney flues and all flue liners in 15.4.2.3 shall be limited to the chimney flues and flue liners requested to be inspected.~~

My name is Michael Segerstrom. With my wife Kathleen we own and operate Bridgewater Chimney Sweeps LLC located in Bridgewater, NJ. I have been inspecting and servicing chimneys, vents and hearth appliances for 26 years, and we established our business and joined the NFPA in 2004. I have inspected thousands of chimneys, vents and hearth appliances, the majority of which were inspected in accordance with the Levels of Inspection found in the "Inspection of Existing Chimneys" chapter of the 211 Standard (currently Chapter 15).

I have held the F.I.R.E. Service Certified Fireplace and Chimney Inspector credential for more than 15 years, and hold both the CSIA's Master Chimney Sweep credential and the NFI's Master Hearth Professional credential. I have also been a consultant and instructor in the chimney, venting and hearth industries for over 10 years, creating classes and training in a variety of subjects with inspection being the most provided. I have served as a volunteer on the NCSG's Technical Advisory Council for more than 9 years, and also have dozens of published technical articles in trade publications.

I have listed a portion of my experience and credentials here, with limited additional background information provided later on for the purpose of establishing my stake and interest in this TIA, the 211 Standard, the role the Standard plays in our business SOPs (Standard Operating Procedures) and my instructor engagements. The 211 Standard and changes to it have been our fundamentals of inspections and even many repairs, and are very important to me.

I expect and understand that the 211 Technical Committee TIA 1733 Preliminary Ballot and Comments will have depth and weight with the Standards Council. It is my hope that this TIA Public Comment and others like it will provide a different and very meaningful perspective on the importance of granting this TIA.

I fully support TIA 1733 on both its technical and emergency natures. There are multiple critical points to cover in my Public Comment on TIA 1733, each with its own merit. These points are not presented in a specific order, as the importance and effects could each be debated as the primary concern. As will be evident, it is vital to thoroughly cover these concerns, some at considerable length.

In providing my comments, I will at times attempt to clear up and/or define language and terms used in the NFPA 211, Chapter 15 Levels of Inspection, and TIA Ballot comments made by 211 Technical Committee members. This is necessary in part to help eliminate confusion or inaccuracies. Several of my comments speak to both Technical and Emergency merits. Many of the Technical Committee Ballot Comments speak to the concerns I have. As such, I will provide input on those comments as necessary, to support and explain where and how 15.4.2.4 results in multiple issues.

Overview

The 211 Standard has contained a chapter on “Inspection of Existing Chimneys” for over 20 years, currently Chapter 15. Within this chapter are 3 Levels of inspection, and each Level has a specified circumstance, scope, degree of access and indication. TIA 1733 serves to delete a section of the 2024 Revision (that is a new section to the standard) that is located in the Level II inspection section (Section 15.4) and is specific to the “Scope and Access” of Level II Inspection (Section 15.4.2).

The requirements of the Scope and Access of Level II inspection of a subject chimney have included “all enclosed flues” for over 20 years. The addition/inclusion of 15.4.2.4 into the “Scope and Access” will be the exception to the established requirement to inspect all enclosed flues, and will limit the number of inspected flues within a subject chimney to be only those “requested”.

My concerns with the proposed 15.4.2.4 language and my support of TIA 1733 are as follows.

1. The Level II Inspection requirement to inspect “all enclosed flues” in a chimney is found in 15.4.2.3. It is also found in Table 15.2.1. This requirement is for the flues found in a specific individual chimney. One Technical Committee member TIA comment states “...inspect all their chimneys in their house...”. A TIA comment from another Technical Committee member indicates “the consumer should have a say regarding the chimneys they are using or not.” Both sections 15.4.2.3 and the reference to it found in 15.4.2.4 describe flues or flue liners in a specific chimney system, NOT all of the chimneys present at a home/dwelling. TIA 1733 seeks to delete language being introduced that affects flues within a single chimney structure, NOT language that affects all chimneys at a single home/dwelling.

2. A Technical Committee member states in their TIA Ballot comment “The original proposal that led to this new section was submitted by the National Chimney Sweep Guild...”. This statement leads the reader to believe that the NCSG or its membership proposed or requested the language in 15.4.2.4. The NCSG did submit a proposal, but it did NOT include the new language found in 15.4.2.4. As a member of the NCSG, I am able to accurately state that the NCSG did not ask for or request this. Technical Committee discussions and decisions seem to have “led to” the language in 15.4.2.4, NOT the NCSG’s proposal. In fact, the NCSG’s proposed language is reflected in a different new section, section 15.4.2.5. It’s important that it is clearly understood that the NCSG did not propose the language in 15.4.2.4, and its Membership did not request or ask for it.

3. Language similar to what the NCSG did propose, now found in 15.4.2.5, allows the inspection of one factory built system located within a common chase or structure, without requiring inspection of additional systems within the chase or structure, where those additional systems serve separate homes/dwellings. The language of 15.4.2.5 is as follows: “*Where multiple factory built fireplaces or chimneys are installed in a common structure or chase, the inspector shall not be required to inspect more than the system(s) requested to be inspected by the inspector’s client.*”

Similar language could have been developed by the Technical Committee and utilized to allow the inspection of one chimney flue for one client, in a masonry chimney that contains multiple flues serving different homes/dwellings. This could be introduced during the next revision cycle. An example of potential language could be “*Where multiple flues or flue liners are present in a masonry chimney common to multiple dwellings, the inspector shall not be required to inspect more than the flue(s) or flue liner(s) requested to be inspected by the inspector’s client.*” This would resolve the specific concerns listed in multiple TIA Comments that reference these common multi-flue masonry chimneys serving multiple homes/dwellings. This type of language is

consistent with what the Technical Committee repeatedly describes as the intent of 15.4.2.4 - to relieve the inspector's burden or obligation to inspect all flues in a common masonry chimney that serves multiple homes/dwellings.

4. Multiple TIA Ballot comments reference common multi-flue masonry chimneys that have flues serving different homes/dwellings. One comment goes as far as stating "It is common on the east side of our continent to share a masonry chimney structure with a neighboring dwelling. "Common" may not be the appropriate term to describe how frequently this type of chimney is encountered on the "east side". I am a chimney service and hearth appliance professional that has spent my entire 26 year career on the "east side of the continent" in central New Jersey. Based out of a town with over 50,000 residents, my service area covers hundreds of thousands of residents, and I work on chimneys of all ages, including some very new chimneys along with some of the oldest chimneys in the country. Out of thousands of inspections, I have inspected less than 10 common multi-flue masonry chimneys that serve different homes/dwellings. Having traveled the east coast (Maine to Florida) providing chimney inspection training for over 10 years, I have also not found that these designs saturate the east side of the country. It should be understood that while masonry chimneys common to multiple homes/dwellings do exist in specific areas, they do not exist with statistical frequency throughout the east side of our continent as the comment may suggest.

In stark contrast to the claim of common masonry chimneys serving multiple homes/dwellings on the "east side", most masonry chimneys in my service area in central New Jersey are found in unconnected individual single family homes. In a calendar year, more than half of the chimneys my company inspects are multi-flue masonry chimneys in stand alone homes/dwellings, with over 80% of this half being 2 flue chimneys. And whether suitable for use or not, the vast majority of the 2 flue masonry chimneys have both flues "in use". Many markets on the "east side" are saturated with these 2 flue chimneys in stand alone single family homes/dwellings. It is important to also understand that large portions of the northeast continue to utilize oil for home heating and hot water equipment. These oil appliances are vented almost exclusively into vertical chimneys in many northeast markets, with a large number of these venting into multi-flue masonry chimneys.

5. The Levels of inspection found in Standard 211 have been published for more than 2 decades, or over 20 years. At first, the Levels of Inspection were not embraced by the chimney service industry as a whole. Fast forward 20 years, the industry has adopted these Levels of Inspection as Best Practice. The industry specific general certification examinations include testing on NFPA 211 Levels of Inspection knowledge. Training manuals and guides, in person training courses and even online courses all cover inspecting chimneys in accordance with the Levels of Inspection as found in the Standard 211. Hearth industry certification and trainings also include the Levels of Inspection. Reference to the Levels of Inspection can even be found in product literature and installation instructions for chimney repair and hearth products.

As an award winning instructor that has taught chimney inspection nationwide for over 10 years to thousands of chimney service and hearth appliance professionals, I can state with accuracy that inspecting "all enclosed flues" in a given chimney, the requirement of 15.4.2.3 and Table 15.2.1, has become both the standard and the norm in curriculums, in the services provided by chimney service professionals and has continued to increase with hearth appliance professionals. The introduction of 15.4.2.4 contradicts and conflicts with the requirement to inspect all enclosed flues (15.4.2.3 and Table 15.2.1), a requirement that has been published for over 20 years. With the inclusion of 15.4.2.4, organizations and instructors will have to edit training manuals and guides, replace printed materials, re-write portions of classes, and teach in conflict and contradiction to as much as 20+ years of previous training.

6. Multiple Technical Committee members provide commentary in their TIA ballot comments that seem to describe the requirement to inspect "all enclosed flues" (15.4.2.3 and Table 15.2.1) as a new requirement, that 15.4.2.4 will provide relief for. Statements including "If we attempt to enforce that ALL are inspected" or "Requiring the inspector to inspect those flues is unfair to the inspector." are examples. 15.4.2.3 and Table 15.2.1 are NOT new requirements. These have been in the Levels of Inspection found in the 211 Standard for over 20 years. Companies nationwide have successfully performed to the standard without issue, many for over 20 years. I personally have operated my company following the Levels of Inspection for over 18 years. In those 18 years, I am able to recall only one (potential) client that declined our inspection services based on the inspection of all enclosed flues.

The real point is that it has not happened to my company with any type of frequency at all whatsoever. And it is not reported to me as a national instructor interacting with professionals throughout the country that it occurs frequently. Professionals learned how to effectively communicate to their clients what the standard of care requires, the obligation to adhere to it, the benefits, and there have been countless regular training opportunities for years on how to effectively communicate for those that need it. To summarize this point, if 15.4.2.4 is deleted as the TIA requests, the inspection scope as specified in 15.4.2.3 and table 15.2.1 will remain largely the same. Professionals can continue to operate successfully and efficiently, as they have been for years. If 15.4.2.4 remains, a critical aspect of the scope of Level II Inspection is drastically and dramatically changed.

7. With the addition of 15.4.2.4 to the 2024 211 Standard, there is a clear and resulting conflict within the standard. The 15.4.2.4 exception of only "requested" chimney flues and flue liners specifically references and applies to 15.4.2.3. 15.4.2.4 makes no reference to table 15.2.1. Table 15.2.1 is very much a part of the standard and requirements and very much a part of the requirements of Chapter 15 and the Levels of Inspection. In table 15.2.1, where the Scope row intersects with Level II inspection, it very clearly states that the scope of a Level II Inspection includes "all enclosed flues". Even with the inclusion of 15.4.2.4 in the 211 Standard, there will still be an un-exempted and explicit requirement to inspect all enclosed flues (Table 15.2.1).

This is a very black and white requirement to inspect all enclosed flues. 15.4.2.4 does not reference the table or give us an exception to NOT perform something specified in the table. This creates a difficulty for the professional offering to and/or performing inspections. Which are they required to follow, the 20+ year old requirement in Table 15.2.1, or the new language in 15.4.2.4?

8. Multiple Technical Committee TIA comments reference that if all enclosed flues were required to be inspected, clients may opt to have nothing inspected. Again, these comments present inspecting all enclosed flues as a new requirement, which it clearly is not. These TIA Comments reflect that loss potential in the general public would increase if 15.4.2.4 were deleted. This could be a reasonable talking point if the requirement to inspect all enclosed flues were a new requirement. It has been the requirement of the standard for over 20 years, with an ever and rapidly growing number of professionals following the standard, with some of the largest increases in implementation occurring over the last 5 years.

Since it's not a new requirement, eliminating it with the addition of 15.4.2.4, allowing the untrained and uneducated homeowner/client to pick and choose which flues are inspected, has a very real potential to increase loss. This is a simple conclusion drawn from facts. If less chimney flues are inspected than previously required by the standard (for more than 20 years), then fewer flues will be inspected. By default, if fewer flues are inspected than previously, the opportunities to detect hazards and/or deficiencies will be reduced. If less hazards and/or deficiencies are detected, the real potential for increased losses exists.

In other words, deleting 15.4.2.4 would NOT stand to result in more clients declining inspection, as deleting 15.4.2.4 would leave the "all enclosed flues" scope requirement the same as it has been for more than 20 years. Whereas the addition/inclusion of 15.4.2.4 provides a specification that allows fewer flues to be inspected. Fewer flues than have been required for more than 20 years.

9. Mr. Harper writes: "When allowing the client to request that only certain flues are inspected, hazards may again go unmitigated. For a variety of reasons a client may believe that their additional flue or flues are free of deficiencies. When in reality and in many cases, deficiencies and hazards are present, and the client is simply unaware of the actual condition of an additional flue. An opportunity to prevent loss is waived by the client and missed, making the client assume the role of chimney service professional, while lacking the education and training that backs the chimney service trade." I agree absolutely, adding that the client may also be assuming the role of hearth appliance professional, without the necessary education and training to do so.

10. There are TIA Technical Committee comments that reference the financial aspects of inspecting all enclosed flues. Comments referencing both the financial burden to the client, and resulting profit opportunities for chimney and hearth professionals. Again, the chimney service and hearth appliance professional industries

have become increasingly effective in communicating the 20+ year old requirements of the inspection standard to clients. With clients being consistently understanding and accommodating.

One TIA comment implies that the Levels of Inspection are being used as “sales tools”. If a chimney, vent or hearth appliance is in need of repair or corrective action, somebody has to do it. It begs the questions, how else are systems to be repaired to a condition suitable for use, if they are not first inspected? How are deficiencies to be detected, if systems are not inspected? The reality is that an incredible number of chimneys, vents and hearth appliance systems are in need of repairs/corrective actions for suitability of use. This is something that if polled, those on the Technical Committee performing inspections would agree on. The scope of repairs will vary but the need is consistent and incredibly frequent. Having a clear standard for over 20 years has allowed the industries to detect deficiencies and recommend repairs prior to loss events, rather than after them. Regardless of who would be performing repairs.

11. With all due respect to industry experts and investigators, certain things cannot be guaranteed or predicted. Just like only the potential for increased loss can be accurately predicted with the addition of 15.4.2.4, but not the actual losses, certain other guarantees cannot be made or implied. It has been stated twice in the TIA comments that one Technical Committee member has “no knowledge of any fire loss, injury, or death as a result of the failure to inspect ALL chimneys within the same structure”. 15.4.2.4 and TIA 1733 are NOT referencing or specific to “all chimneys within the same structure”. 15.4.2.4 and TIA 1733 are referencing and specific to all FLUES within a chimney, which is notably different. It is unclear if that was the intent of the comment(s).

Just because I have never seen some particular chimney defect, let’s say a light fixture inside a fireplace, doesn’t mean it doesn’t exist, that it can’t exist, or that I will never see one. Even the nation’s leading experts can’t guarantee something won’t occur, simply because they have never seen it, or to rephrase it accurately, haven’t seen it yet. This especially cannot be guaranteed if the 20+ year requirement to inspect all enclosed flues is eliminated, and fewer flues are inspected.

12. The addition of 15.4.2.4 allows the client to request or opt out of the inspection of additional flue(s) in a given chimney, but to opt out ONLY that component of the scope and access of a Level II Inspection. Looking at the requirements, 15.4.2 Scope and Access states "Level II Inspection shall include all accessible portions of the chimney exterior and interior, including the following: (1) Areas within accessible attics, crawl spaces and basements (2) accessible portions of the appliance and chimney connection". 15.4.2.4 does not reference or provide exception for the requirements of 15.4.2. This results in the specified scope of 15.4.2 to be completed, even if an additional flue in the chimney is not requested to be inspected.

Table 15.2.1 has very similar Scope and Access requirements also NOT covered in the 15.4.2.4 exception. As fact, this means that even if the client does not request inspection of additional flues (as per 15.4.2.4), the Scope of Level II still requires the inspector to look at every other accessible part of the system that uses any additional flue(s). Woodstoves, connectors, hearths, hearth extensions, ash pits/dumps, mantles, clearances in all specified locations/areas, fireboxes, throats, dampers, smoke chambers, connections to liners, and more. 15.4.2.4 only provides an exception for the additional "chimney flues and flue liners" portion of the same chimney.

With all of the available modern equipment and methods, internally inspecting the flue or flue liner portion of any system is often the briefest portion of a level II inspection. There are TIA Technical Committee comments that indicate that inspecting additional flues or flue liners “takes a considerable amount of time”. Yes, completing a Level II Inspection on a multi-flue chimney can take a considerable amount of time, but it’s not often because of the need to inspect the actual flues. The time requirement results from completing all of the inspection aspects NOT exempted by 15.4.2.4. In summary, even if the client only requests inspection of one flue in a multi-flue masonry chimney, considerable time will likely still be necessary to perform all the additional required inspection aspects specified in 15.4.2 and table 15.2.1.

13. To further another point provided by Mr. Harper, many chimney service and hearth appliance professionals that inspect chimneys, also perform repairs to and/or installations in those systems. In many cases, repair products and appliances will actually require an inspection beforehand. Even where the inspector does not

perform repairs, there is still a recommendation provided to the client to have certain repairs performed. Many chimney repairs to one flue in a multi-flue chimney, will impact additional flues in that same chimney. The condition and/or installation method of additional flues in the same chimney often also affect repairs and repair recommendations.

Not having necessary information on the condition and installation methods of adjacent flues may result in insufficient repairs, damage to uninspected flues and/or unmitigated hazards in the system. A written disclaimer from a client somehow waiving inspection of additional flues would NOT eliminate repair impacts to additional flues, would NOT eliminate effects of adjacent flues on repair methods, and would NOT eliminate existing deficiencies or hazards in adjacent flues.

Conclusion

I believe the Technical Nature of TIA 1733 is substantiated through criteria including but not limited to contradictions of requirements within Chapter 15 of the Revised 2024 edition of the 211 Standard, contradictions to requirements within Chapter 15 of the current (and previous) 211 Standard, and resulting complications/burdens imposed on inspectors and repair technicians servicing chimneys.

I believe the Emergency Nature of TIA 1733 is substantiated as publication of the 2024 211 Standard, with the inclusion of 15.4.2.4, it is reasonable to conclude that the number of in use flues inspected will be reduced. The language of 15.4.2.4 supports the inspection of fewer flues than has been required by the Standard for over 20 years. It is reasonable to conclude that the inspection of fewer flues has a very real potential to increase losses associated with chimneys.

I have great respect for all those that give of themselves to perform volunteer committee work, especially on committees in their field. I continue to appreciate the work of the current and previous 211 Standard Technical Committees. Without such work, chimney, vent and hearth appliance inspection would not have evolved and advanced to what it is today. I believe that while there may have been Technical Committee intent to address a limited issue with a specific inspection scenario, a scenario that does occur at times, the introduction and inclusion of 15.4.2.4 impacts and adversely effects a much greater number of different scenarios.

As an active chimney inspector I can definitively speak to how the inclusion of 15.4.2.4 will adversely affect my business, our SOPs and clients in our market. As an instructor and consultant in the industry that travels nationwide, I am also able to reliably provide input on how the inclusion of 15.4.2.4 will also adversely affect other companies, areas and markets throughout the country.

I am grateful for this opportunity, and sincerely request consideration of my Public Comment talking points, consideration of additional Public Comments in support of TIA 1733, and sincerely request the granting of TIA 1733.

Thank you,

Michael Segerstrom

Michael Segerstrom
Bridgewater Chimney Sweeps LLC
HIC Reg #13VH00393500

Senior Consultant - Ryan Consultants Group

F.I.R.E. Certified Inspector
C.S.I.A. Certified Master Chimney Sweep
N.F.I. Certified Master Hearth Professional

Bridgewater Chimney Sweeps LLC or one or more of its employees are members of the following:

New Jersey Chimney Sweep Guild
National Chimney Sweep Guild
National Fire Protection Association
International Code Council

Foran, Rosanne

**Comment No. 10
SUPPORT**

From: Josh Merson
Sent: Wednesday, July 5, 2023 2:51 PM
To: Shared TIAs
Subject: TIA No. 1733 Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I am opposed to the changes to the 2024 NPFA 211, Reference 15.4.2.4. In an area that is littered with multi-flue chimneys, this change allow for the homeowner to make the decision for the professional on the state of the flues that they do not request to be inspected. This change will take more away from the professional and leave it up to chance. I grew up the son of a Fire Marshall in Howard County, Maryland, and the amount of chimney fires or carbon monoxide poisoning from flues that were deemed safe or free of issues by a homeowner have effected the amount of those. I believe that adding the wording of 15.4.2.4, will only added to the increased numbers of issues to chimneys and potential homeowner risk. Removing this section is the only thing we can do as an industry to ensure the safety of the homeowner stays intact.

Josh

Foran, Rosanne

Comment No. 11
SUPPORT

From: Bob
Sent: Thursday, July 6, 2023 10:19 AM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

I'm a 3rd generation certified chimney sweep in Maine. This change to allow the homeowner to decide what I can inspect is terrible. Homeowners do not know what they need, and should not be asked their opinion on the condition of their chimney. That's why we are there. Our customers heat with mostly oil. We are only called out to sweep their secondary wood heat source. If we were to just ask if they wanted us to inspect their oil flue we would be told no most of the time. Even now when we are booking the inspection and we go over the process and price and they hear we will be inspecting their oil flue, most all customers tell us that it's not necessary. That their boiler tech checks it every year. Not sure if whoever is reading this is familiar with oil or boiler techs/service but they absolutely do not check the chimney in any capacity.

We reline way more liners for boiler than we do wood stoves every year. Most all of those initial appointments the customer had no idea of the condition of their oil flue(or even how/where their boiler was vented).

This change severely affects my business and the integrity I hold in the NFPA211.

DO BETTER

Bob Frechette
Frechette Chimney LLC

Sent from my iPhone

Foran, Rosanne

Comment No. 12
SUPPORT
page 1 of 2

From: Copper Ridge
Sent: Thursday, July 6, 2023 10:36 PM
To: Shared TIAs
Subject: Comment on Proposed TIA 1733 on NFPA 211

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To whom it may concern,

My name is David Steward, I am a chimney and fireplace professional. I have been in the industry for over 10 years. Before that, I served in the Air Force as a Civil Engineer. I carry multiple industry certifications and serve on several boards and committees.

I am opposed to the changes of Chapter 15 of the NFPA 211, and I support the TIA that Bob Harper has submitted. As a chimney professional, who is in the field daily, this will severely limit the scope of the inspection standards. This change will water down the strength and intent of the NFPA 211 as well as all codes and standards that reference it. WE are the professionals, and as such, should not allow the client to make the decision on what should or shouldn't be inspected. A Level II Inspection, most commonly utilized during a real estate transaction, should never be allowed to have the scope narrowed. This will lead to confusion and allows the client essentially to be brought into the standard.

Often times the most egregious and dangerous issues would not be found if the entire system of multi flue systems were not inspected properly.

By changing the requirements in Chapter 15, yet not aligning the rest of the Standard, there is now even more contradiction and confusion to be found in the 211.

I believe the original intent of the change was in reference to multi owner / multi property scenarios where accessibility and inspection of all systems are not always available due to ownership differences. In that specific case, I support the wording of "flues being requested"...when in a multi housing or condo scenario where access to all enclosed flues is impossible.

I echo Bob Harper's sentiments as a whole, and especially this: "While NFPA 211 in and of itself is not a model building code but a standard, it is referenced in most model building codes and virtually every combustion appliance's installation instructions. To water down or soften 211 is to do the same to the adopting model codes and possibly to the listed instructions of combustion equipment."

I sincerely appreciate each and every one of you on the committee. Thank you for all of your time and efforts that you put into this wonderful industry and the 211 Standard. Chapter 15 has been a Godsend for our industry by limiting our liability as well as creating an actual industry standard in which we can easily and accurately follow. Changing it will muddy the water to a degree in which cannot be cleaned.

Sincerely and Respectfully,
David Steward
Chimney and Venting Professional