



Public Comment No. 14-NFPA 211-2022 [Global Input]

The terms "clean", "cleaned" and/or "cleaning" as they pertain to maintaining a chimney, vent or fireplace system should be removed from the standard. These words should be replaced with "sweep", "swept" and/or "sweeping". The reason for this recommendation is that these systems are not typically clean or cleaned after standard service or maintenance. They have had combustible and/or corrosive combustion by-products removed to help reduce the risk of ignition of deposits and/or damage to the system. While the systems have been serviced to an operational condition, minimal deposits and/or stains typically remain in areas, therefore the system isn't actually clean.

Statement of Problem and Substantiation for Public Comment

Clients are often left thinking their systems are "clean", when in actuality they are not. This has resulted in unsatisfied clients for decades. While not an epidemic or regular occurrence, accurate terminology and the use of it would help eliminate expectations from some clients.

Related Item

- FR

Submitter Information Verification

Submitter Full Name: Michael Segerstrom

Organization: Bridgewater Chimney Sweeps Llc

Street Address:

City:

State:

Zip:

Submittal Date: Sat May 21 23:22:07 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: A blanket change from clean to sweep can inadvertently change the context of requirements. The committee advises the submitter to come back with specific changes in terminology for the committee to review in order to more accurately change the requirements.



Public Comment No. 15-NFPA 211-2022 [Section No. 1.1]

1.1 Scope.

This standard applies to the design, installation, maintenance, and inspection of all chimneys, ~~fireplaces~~, venting systems, and solid fuel-burning appliances and fireplaces .

Statement of Problem and Substantiation for Public Comment

This change is necessary to clarify the NFPA 211 does not regulate gas fireplaces. Gas appliances and fireplaces are within the scope of NFPA 54, not NFPA 211. NFPA 211 does not contain any guidance or requirements for gas fireplaces so this change is necessary to correct the confusing "all fireplaces" reference in the existing scope statement.

Related Item

- Public Input # 2

Submitter Information Verification

Submitter Full Name: James Brewer

Organization: Rooftop Safety USA LLC

Affiliation: National Chimney Sweep Guild

Street Address:

City:

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Submittal Date: Fri May 27 15:22:31 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: There are currently requirements in the document that apply to non-solid fuel burning fireplaces in the standard and a blanket change in the scope would conflict with those requirements. The Technical Committee has formed a task group to review the conflicts (see NFPA 211 Second Draft Minutes)



Public Comment No. 5-NFPA 211-2022 [New Section after 3.3.49]

3.3.49.3 Connector Joints

The joints where the sections of a connector are fastened together, as well as the joints where a connector is fastened to a flue collar on a fuel-burning appliance and where a connector is fastened to a chimney, gas vent or Type L vent on a fuel-burning appliance.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Section_211_Narrative_4-19-2022_Revised.docx	Section 211 Narrative	

Statement of Problem and Substantiation for Public Comment

See attached narrative

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 6-NFPA 211-2022 [Section No. 9.7.9]	
Public Comment No. 7-NFPA 211-2022 [New Section after 9.7.9]	
<u>Related Item</u>	
• Resolution CI-1-NFPA 211-2021	

Submitter Information Verification

Submitter Full Name: Gary Braun
Organization: None
Street Address:
City:
State:
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Submittal Date: Fri Apr 29 15:56:35 EDT 2022
Committee: CHI-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: [SR-3-NFPA 211-2022](#)
Statement: Connectors need to be mechanically fastened to the appliance.

- Section 211 requires clarification regarding fastening the connector to the flue collar on a fuel burning heating appliance
- The intent of the proposed revisions to Section 211 is to have 3.3.49 define the term “connector joint”, and for 9.7.9 and 9.7.10 to clearly and expressly apply to the joint between the connector and the flue collar on a heating appliance and to require some type of fastener or fastening system at all “connector joints” including the connector joint at the point where the connector joins the flue collar
- The intent of the proposed revisions to Section 211 is to have 3.3.48 and 9.7.10 clearly and expressly apply to the joint between the connector and the flue collar on a heating appliance – i.e. the “connector joint”
- The use of a so-called “friction-fit” or “slip-fit” to attach a connector to the flue collar of a heating appliance at the “connector joint” should never be permitted
- The use of “slip-fits” and “friction-fits” only to attach the connector to a flue collar on a heating appliance is inherently dangerous and unnecessarily poses the risk of exposing occupants of the structure being heated to the release of carbon monoxide or other toxic gases in the event the connector becomes detached or loosened from the flue collar
- My mother died of carbon monoxide asphyxiation in 2016 when her oil-fired boiler malfunctioned causing a delayed-ignition event. The delayed-ignition event blew the connector completely off of the flue collar and out of the chimney opening, causing the entire connector to fall to the floor of the basement where the boiler was located
- No screws, rivets, straps or other approved means of attaching the connector to the flue collar on my mom’s boiler were used. Instead, only a “friction-fit” was used to attach the connector to the collar. I am convinced that the connector would have remained attached to the flue collar on mom’s boiler had sheet metal screws, straps or bands been used at the collar, and that she would have survived the delayed-ignition incident in such case
- No other person should die in the fashion my mom did for the lack of a few sheet metal screws and/or a couple of pieces of metal strapping

- Connectors that are not securely fastened to a flue collar with screws, rivets, strapping or other approved means are at **significant** risk of becoming detached from the flue collar as a result of a delayed-ignition event, vibrations from operation of the heating appliance or some external source, or the connector being moved or bumped into including accidentally
- Section 211 requires screws or other fasteners at the joints where the separate sections of the connector are joined together, and also specifically prescribes the method for securely attaching the connector to a masonry chimney including via use of mortar. See 9.7.1
- However, Section 211 is effectively and presently silent as to the specific means of attaching the connector to the flue collar
- I am proposing that 3.3.48 be revised to expressly define “connector joint” to include the joint where the connector joins the flue collar on a fuel burning heating appliance. I am further proposing that 9.7.10 be revised to create an unambiguous standard requiring that the “connector joint” be secured to the flue collar in the same or equivalent fashion as are the separate sections of the pipe making up the connector
- The venting system for a heating appliance is only as good as its weakest link. Permitting the use of a so-called “friction-fit” at the joint where the connector attaches to the flue collar operates to diminish or eliminate the protection otherwise afforded by 9.7.1 (requiring cementing of thimble where connector joins a masonry chimney) or the current version of 9.7.9 (which requires screws or other fasteners where the connector pipe sections are joined together). Simply put, why require screws, rivets, banding or strapping, or the cementing of the chimney-end of the connector into a chimney when the flue-collar end of the connector is simply slipped over and is not securely fastened to the flue collar?
- Requiring fasteners of some type of the joint between the collar and the connector is low-cost and requires minimal time and effort. The cost-benefit rationale for revising the standard as proposed is *overwhelmingly compelling*. Lives will be saved by adopting the proposed revisions at little or no cost in terms of money, time and effort!

- The equivalency provisions at 1.4 effectively provide that means other than those expressly described in the revised standard may be employed to provide the protection required including when the means expressly described in the proposed, new standard are impractical. For example, if the collar to which the connector is attached is made of cast iron and a concern exists about drilling a hole in the collar in order to use screws at the “connector joint”, then the straps or bands is permitted as are “any other approved means” or “equivalent” means

**Public Comment No. 7-NFPA 211-2022 [New Section after 9.7.9]**

9.7.10 The connector joint where the connector joins a masonry chimney shall be secured in accordance with 7.1.9.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Section_211_Narrative_4-19-2022_Revised.docx	Section 211 Narrative	

Statement of Problem and Substantiation for Public Comment

See attached narrative

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 6-NFPA 211-2022 [Section No. 9.7.9]	Part of new standard for "connector joints"
Public Comment No. 5-NFPA 211-2022 [New Section after 3.3.49]	Definition of "connector joint"

Related Item

- CI-1 NFPA 211-2021

Submitter Information Verification

Submitter Full Name: Gary Braun
Organization: None
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 29 16:06:22 EDT 2022
Committee: CHI-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: [SR-3-NFPA 211-2022](#)
Statement: Connectors need to be mechanically fastened to the appliance.

- Section 211 requires clarification regarding fastening the connector to the flue collar on a fuel burning heating appliance
- The intent of the proposed revisions to Section 211 is to have 3.3.49 define the term “connector joint”, and for 9.7.9 and 9.7.10 to clearly and expressly apply to the joint between the connector and the flue collar on a heating appliance and to require some type of fastener or fastening system at all “connector joints” including the connector joint at the point where the connector joins the flue collar
- The intent of the proposed revisions to Section 211 is to have 3.3.48 and 9.7.10 clearly and expressly apply to the joint between the connector and the flue collar on a heating appliance – i.e. the “connector joint”
- The use of a so-called “friction-fit” or “slip-fit” to attach a connector to the flue collar of a heating appliance at the “connector joint” should never be permitted
- The use of “slip-fits” and “friction-fits” only to attach the connector to a flue collar on a heating appliance is inherently dangerous and unnecessarily poses the risk of exposing occupants of the structure being heated to the release of carbon monoxide or other toxic gases in the event the connector becomes detached or loosened from the flue collar
- My mother died of carbon monoxide asphyxiation in 2016 when her oil-fired boiler malfunctioned causing a delayed-ignition event. The delayed-ignition event blew the connector completely off of the flue collar and out of the chimney opening, causing the entire connector to fall to the floor of the basement where the boiler was located
- No screws, rivets, straps or other approved means of attaching the connector to the flue collar on my mom’s boiler were used. Instead, only a “friction-fit” was used to attach the connector to the collar. I am convinced that the connector would have remained attached to the flue collar on mom’s boiler had sheet metal screws, straps or bands been used at the collar, and that she would have survived the delayed-ignition incident in such case
- No other person should die in the fashion my mom did for the lack of a few sheet metal screws and/or a couple of pieces of metal strapping

- Connectors that are not securely fastened to a flue collar with screws, rivets, strapping or other approved means are at **significant** risk of becoming detached from the flue collar as a result of a delayed-ignition event, vibrations from operation of the heating appliance or some external source, or the connector being moved or bumped into including accidentally
- Section 211 requires screws or other fasteners at the joints where the separate sections of the connector are joined together, and also specifically prescribes the method for securely attaching the connector to a masonry chimney including via use of mortar. See 9.7.1
- However, Section 211 is effectively and presently silent as to the specific means of attaching the connector to the flue collar
- I am proposing that 3.3.48 be revised to expressly define “connector joint” to include the joint where the connector joins the flue collar on a fuel burning heating appliance. I am further proposing that 9.7.10 be revised to create an unambiguous standard requiring that the “connector joint” be secured to the flue collar in the same or equivalent fashion as are the separate sections of the pipe making up the connector
- The venting system for a heating appliance is only as good as its weakest link. Permitting the use of a so-called “friction-fit” at the joint where the connector attaches to the flue collar operates to diminish or eliminate the protection otherwise afforded by 9.7.1 (requiring cementing of thimble where connector joins a masonry chimney) or the current version of 9.7.9 (which requires screws or other fasteners where the connector pipe sections are joined together). Simply put, why require screws, rivets, banding or strapping, or the cementing of the chimney-end of the connector into a chimney when the flue-collar end of the connector is simply slipped over and is not securely fastened to the flue collar?
- Requiring fasteners of some type of the joint between the collar and the connector is low-cost and requires minimal time and effort. The cost-benefit rationale for revising the standard as proposed is *overwhelmingly compelling*. Lives will be saved by adopting the proposed revisions at little or no cost in terms of money, time and effort!

- The equivalency provisions at 1.4 effectively provide that means other than those expressly described in the revised standard may be employed to provide the protection required including when the means expressly described in the proposed, new standard are impractical. For example, if the collar to which the connector is attached is made of cast iron and a concern exists about drilling a hole in the collar in order to use screws at the “connector joint”, then the straps or bands is permitted as are “any other approved means” or “equivalent” means



Public Comment No. 6-NFPA 211-2022 [Section No. 9.7.9]

9.7.9

Connectors shall be supported, and connector joints shall be fastened using sheet metal screws, rivets, banding or strapping, or other approved means.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Section_211_Narrative_4-19-2022_Revised.docx	Section 211 Narrative	

Statement of Problem and Substantiation for Public Comment

See attached narrative

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 5-NFPA 211-2022 [New Section after 3.3.49]</u>	New standard per revised 9.7.9 and new 9.7.10 for new definition of "connector joint" proposed for 3.3.49.3
<u>Public Comment No. 7-NFPA 211-2022 [New Section after 9.7.9]</u>	
<u>Related Item</u>	
• CI-1-NFPA 211-2021	

Submitter Information Verification

Submitter Full Name: Gary Braun

Organization: None

Street Address:

City:

State:

Zip:

Submittal Date: Fri Apr 29 16:02:27 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-3-NFPA 211-2022](#)

Statement: Connectors need to be mechanically fastened to the appliance.

- Section 211 requires clarification regarding fastening the connector to the flue collar on a fuel burning heating appliance
- The intent of the proposed revisions to Section 211 is to have 3.3.49 define the term “connector joint”, and for 9.7.9 and 9.7.10 to clearly and expressly apply to the joint between the connector and the flue collar on a heating appliance and to require some type of fastener or fastening system at all “connector joints” including the connector joint at the point where the connector joins the flue collar
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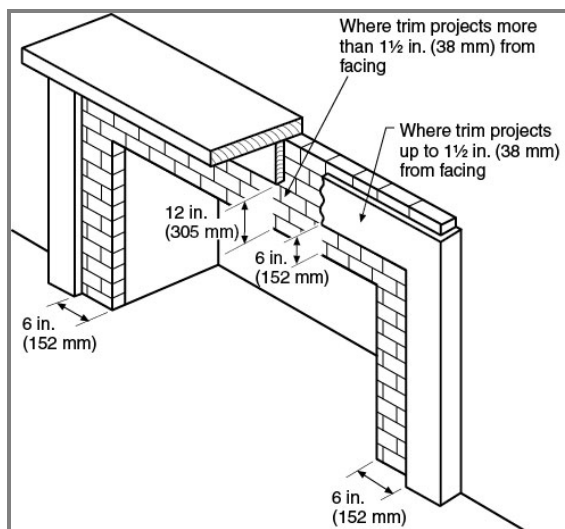


Public Comment No. 13-NFPA 211-2022 [Section No. 11.2.5.4]

11.2.5.4

Combustible material ~~above and projecting~~ material projecting more than 1½ in. (38 mm) from a fireplace opening shall ~~off the facing of a fireplace shall~~ not be placed less than 12 in. (305 mm) from the top or sides of the fireplace opening. (See Figure 11.2.5.4.)

Figure 11.2.5.4 Fireplace Clearance to Combustible Material.



Statement of Problem and Substantiation for Public Comment

By adding this requirement for the sides of a fireplace opening, it will be more consistent with the International Residential Code/Building Code. The Standard 211 currently does not have language that prevents a 10" projection 7" from the sides of a fireplace opening. This addition would place a 10" projection or even a perpendicular combustible wall 12" from the sides of the opening.

Related Item

- FR

Submitter Information Verification

Submitter Full Name: Michael Segerstrom
Organization: Bridgewater Chimney Sweeps Llc
Street Address:
City:
State:
Zip:
Submittal Date: Sat May 21 23:13:53 EDT 2022
Committee: CHI-AAA

Committee Statement

Committee Rejected but held

Action:

Resolution: The proposed changes are new material for this code cycle and is being rejected but held for the next cycle.



Public Comment No. 1-NFPA 211-2022 [Section No. 11.2.10]

11.2.10* Masonry Fireplace Accessories.

Fireplace accessories shall be ~~one~~ all of the following:

- (1) Installed by a qualified agency
- (2) Listed and installed in accordance with the terms and conditions of their listing
- (3) Installed in accordance with the accessory manufacturer's installation instructions

Statement of Problem and Substantiation for Public Comment

Currently there is disconnect between the IRC and the NFPA211. This would include inserts and many other accessories. Currently IRC requires that we install products in accordance with the terms and conditions of their listings and in accordance with the manufacturer installation instructions. As qualified agencies and professionals in the industry we should be meeting both of these requirements as the IRC is code in nearly all jurisdictions to varying degrees in all 50 states. The NFPA211 is a guide and is at this time less restrictive than code. Professionally and ethically per the agreements we sign in becoming certified we agree to uphold the codes and standards of the industry and follow industry best practices. When requirements conflict industry best practice says we go with the more restrictive of the two. In this case the IRC and the terms and conditions of listing would be more restrictive than some of the manufacturers instructions. As an industry we should be setting a standard that gives us a solid baseline requirement backed by all the facts. If people would like to choose to do otherwise they may do so at their own risk and the risk of their clients. If we do not draw our own firm lines in the sand then litigation and regulation will do so for us down the road.

Related Item

- 11.2.10* Masonry Fireplace Accessories

Submitter Information Verification

Submitter Full Name: Daniel Freeman

Organization: Freeman Fire Inspectors Ltd / The Chimney Doctor Ltd

Street Address:

City:

State:

Zip:

Submittal Date: Wed Mar 02 15:31:58 EST 2022

Committee: CHI-AAA

Committee Statement

Committee Rejected but held

Action:

Resolution: The proposed changes are new material for this code cycle and is being rejected but held for the next cycle.



Public Comment No. 16-NFPA 211-2022 [New Section after 15.1]

TITLE OF NEW CONTENT

Add new section 15.1.3 * Inspections required by this chapter shall be limited to appliances and systems regulated by this standard.

Add new Annex A15.1.3 Inspections required by this chapter are not required to include inspection of appliances not covered by this standard. For example, when a gas or oil-fired furnace is connected to a chimney the inspector is required to inspect the connector and chimney but not the appliance.

Statement of Problem and Substantiation for Public Comment

NFPA 211 does not provide any guidance on the inspection of gas or oil fired appliances. It needs to be clear that when inspecting systems with these appliance types the inspection is limited to the venting system. This standard should not make the inspector responsible for inspection of an appliance without providing the criteria for that inspection.

Related Item

- Public Input # 5

Submitter Information Verification

Submitter Full Name: James Brewer

Organization: Rooftop Safety USA LLC

Affiliation: National Chimney Sweep Guild

Street Address:

City:

State:

Zip:

Submittal Date: Fri May 27 15:42:34 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: Certain aspects inspection of oil and gas burning appliances fall under the scope of this standard and need to be inspected.



Public Comment No. 9-NFPA 211-2022 [Section No. 15.2.6]

15.2.6

Where inspections are ~~indicated~~ required or requested at a specific level of inspection but circumstances prevent the completion of that level, the inspector shall do the following:

- (1) Indicate the level of inspection completed
- (2) Document the reasons the higher level inspection was not completed_

Statement of Problem and Substantiation for Public Comment

Chapter 15 of Standard 211 uses the term/word "shall" approximately 45 times. This added section should use language that supports this chapter of the standard.

Related Item

- FR

Submitter Information Verification

Submitter Full Name: Michael Segerstrom

Organization: Bridgewater Chimney Sweeps Llc

Street Address:

City:

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Submittal Date: Sat May 21 22:00:50 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: The inspection documents use the term indicated and indicated is the appropriate term to use in this requirement.



Public Comment No. 11-NFPA 211-2022 [Section No. 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.~~

Statement of Problem and Substantiation for Public Comment

For more than 20 years the inspection chapter of Standard 211 has not left the scope of the Standard of Care inspections up to the client. The professional advises the client of the appropriate level of inspection based on conditions, circumstances and indicators reported by the client. By adding this section and including the word "requested", it allows the client to request less than what has been the Standard of Care or Industry Standard for chimney inspection for more than 20 years. In addition to being a general disservice to clients and the industry, it creates a variety of concerns and issues for both the client and the individual or firm performing the inspection.

The most obvious concern is the ability of the client to prevent inspection of a portion of the system that will directly affect continued use and/or proper and suitable repairs to the system. Example: the inspector only inspects the heating appliance flue of a 2 flue masonry chimney that also has a fireplace system and flue. The client does not "request" inspection of the fireplace system or flue which results in the inspector having no knowledge of the heating appliance flue clay liner exposed in the fireplace smokechamber. This is just one basic example. There are many.

For 20 years the inspector has been compelled to complete a level 2 inspection (when indicated) based on the requirements of the inspection chapter and the use of the word "shall" throughout the chapter. By adding this section and the word "requested", it allows the client to determine the scope of inspection, in complete contrast to the Standard. Adding this section and language does far more than just simplify inspection of chimneys that have multiple flues owned by someone other than the client. This section is not specific to that, and covers all chimneys, not just those that contain systems owned by more than one client.

This section should be deleted as the new section, 15.2.6 covers documenting when a chimney can't be fully inspected. If this section is not deleted, it should be fully rewritten to eliminate the word "requested" and must include language that indicates it is specific to only chimneys or chimney chases that contain multiple systems and/or flues owned by multiple clients.

Related Item

- PI

Submitter Information Verification

Submitter Full Name: Michael Segerstrom

Organization: Bridgewater Chimney Sweeps Llc

Street Address:

City:

State:

Zip:

Submittal Date: Sat May 21 23:01:12 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: This requirement is necessary to limit the inspection to the chimney or venting systems requested and not expand the inspection to all of the chimneys or venting systems in the common chimney structure.



Public Comment No. 4-NFPA 211-2022 [Section No. 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.~~

Statement of Problem and Substantiation for Public Comment

I see that the circumstances that require a Level II inspection have not changed, just the requirement to inspect via image scanning all enclosed flues. This does not change the requirement to still inspect the structure at all accessible areas (of course not being able to access adjacent units in a common chimney would still render them inaccessible). I believe that in a masonry system for example all flues and flue liners should be inspected as part of a Level II inspection every time, if circumstances and access permits. This opens the door to require otherwise.

Overall I think this section should simply be removed, need not be mentioned, and will only cause confusion. Because you added in 15.2.6 the wording suggested for 15.4.2.4 is unnecessary as in those circumstances we would just be required to follow 15.2.6 and indicate the level of inspection completed, and why the higher level inspection was fully completed. 15.4.2.4 already addresses this issue. Overall the requirement to perform a Level II would still apply... The only thing this changes is whether or not you are required to scan the other flues in the system. We would still be required as part of a Level II to measure fireplace openings, size flues, inspect construction, clearances, hearth extensions, etc...

This statement is too broad and goes too far, allowing any client to specify what shall or shall not be inspected based on their request. There will be many time when we will not be able to determine the serviceability of a system or appliance as a result. The rationale for this statement gives examples of homes built with common wall masonry chimneys serving different occupancies, or shared chases... but this would open it up much further than that.

Reading this, to my understanding does not change the requirement to inspect the remainder of a masonry structure and all attached appliances (clearances, opening dimensions, etc...), only whether or not a video inspection is performed on the flues not requested to be inspected? If the other systems are in use however this could result in issues as smoke or creosote leakage from one flue can affect another flue in the same masonry structure. A chimney fire in one flue without a wythe, or even with a wythe, could damage or shatter flue tiles in an adjacent flue. Without the requirement to perform an image scan of that flue and fully inspect the flue and flue lining this could be missed, and not included in inspections for insurance purposes. This poses a blind spot and a potential liability issue for inspectors.

Related Item

- 15.4.2.4

Submitter Information Verification

Submitter Full Name: Daniel Freeman

Organization: Freeman Fire Inspectors Ltd / The Chimney Doctor Ltd

Street Address:

City:

State:

Zip:

Submittal Date: Wed Mar 02 16:02:37 EST 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: This requirement is necessary to limit the inspection to the chimney or venting systems requested and not expand the inspection to all of the chimneys or venting systems in the common chimney structure.



Public Comment No. 12-NFPA 211-2022 [Section No. 15.4.2.5]

15.4.2.5

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~~ owned and/or occupied by the inspector's client.

Statement of Problem and Substantiation for Public Comment

The word "requested" is unnecessary in this section as the client only owns and/or occupies what they own and/or occupy. It goes without saying that a client can't allow us to inspect their neighbor's system. This language with my recommended removal of "requested" provides simple clarification to the inspector.

Related Item

- PI

Submitter Information Verification

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Submittal Date: Sat May 21 23:03:22 EDT 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: The process of reporting is outside the scope of the standard. The proposed changes would also limit it to systems not owned by the occupant/owner of the flue being inspected and this is also outside the scope of the standard.



Public Comment No. 3-NFPA 211-2022 [Section No. 15.4.2.5]

15.4.2.5

Where multiple factory built fireplaces or chimneys are installed in a common structure or chase where flues serve different occupancies , the inspector shall not be required to inspect more than the system(s) requested to be inspected by the inspector's client. If during the course of inspection, however, deficiencies or concerns are noted with an adjacent chimney, vent, or appliance installation noted deficiencies or concerns shall be disclosed and further inspection recommended in the inspectors report. This shall not require the inspector to perform further inspection on these systems.

Statement of Problem and Substantiation for Public Comment

This still needs discussion to make sure that it does not create weird loop holes or cause inspectors and sweeps to not disclose issues they see with other systems while completing their inspection. This could still leave them liable if they do not disclose something in their report. It could be added as a separate item. Without this requirement sweeps and inspectors may not tell homeowners about issues with their neighbors chimney in a common structure/chase... and could be leaving them open to a fire even if their system is properly installed as their neighbors could still light the structure on fire.

Also I believe that we need to include the line "where flues serve different occupancies" as that was given as the rationale for the change.

Related Item

- 15.4.2.5

Submitter Information Verification

Submitter Full Name: Daniel Freeman

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Submittal Date: Wed Mar 02 15:58:17 EST 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: The process of reporting is outside the scope of the standard. The proposed changes would also limit it to systems not owned by the occupant/owner of the flue being inspected and this is also outside the scope of the standard.



Public Comment No. 2-NFPA 211-2022 [Section No. A.3.3.48]

A.3.3.48 Concealed (Inaccessible).

The following generally are considered concealed or inaccessible:

- (1) Areas of the chimney that can be viewed only by damaging finished surfaces of the home or removing permanently attached components of the home
- (2) Attics that provide less than 48- 30 in. (1.22 m) of vertical clearance or 24 in. (0.61 m) of horizontal clearance
- (3) ~~Attics without walkways and having insulation that conceals the ceiling joists~~
~~Attics with a temperature exceeding 115°F (46°C)~~
- (4) unobstructed head room at some point above the attic access, where attic access opens into a space greater than 30 square feet in size, or where an attic access is not present
- (5) Crawl spaces that provide less than 24 in 18 in . (0.61 m) of vertical clearance space between the bottom of the floor joists and the ground beneath the bottom of the floor joists at the point of crawlspace access
- (6) Areas within inaccessible and attached common dwelling units through which the chimney or venting subject to inspection are located

Safety hazards that generally will render an attic or crawlspace inaccessible include, but are not limited to, the following:

- (1) Standing water
- (2) Sewage or animal waste
- (3) Broken glass
- (4) Exposed or unsupported electrical wires
- (5) Dangerous animals or insects

Statement of Problem and Substantiation for Public Comment

This list as originally drafted is too broad and use measurements that do not match real world conditions or IRC requirements. These could also be interpreted to not get into the attic or crawlspace at all, even if accessible per IRC requirements. Requirements as specified in the IRC are referenced below.

First off, we are here to inspect a chimney system and verify it is suitable for continued use. As written this will effectively negate the requirement of technicians to perform their job by removing one of the most important requirements in many attics and crawlspaces today. Even those built to code per the IRC have smaller clearances/requirements than those shown here. And we are not termite inspectors, we are chimney professionals inspecting homes built to IRC requirements, with chimneys and appliances that should also be built to IRC requirements. Our minimum should at least mirror the IRC minimums.

Wording and terminology is also important. Many attics, especially when chimneys are at the eaves of the home will have less than 48" of 'vertical clearance' around the chimney system and thus many may elect not to crawl out there and check clearances. Virtually every attic does not have a walkway and will have insulation covering the joists. Adding in this exception will only give inspectors an excuse not to inspect the areas where fires generally start and occur and allow them to simply say it's not accessible and not be held liable for not performing a full inspection. This could result in increased fires. This will open up the way for litigators to get involved after losses and eventually determine what

constitutes an accessible attic for our industry outside of our purview.

In point 2, the use of the word 'clearance' could be misleading... clearance from the piping or chimney system... or clearance for a body to fit. Explanation/suggestion: per requirements in the IRC for attic access R807, which delineates the minimum size attic space for which an access is required we see that attic access are required anytime 30" of unobstructed head room is present at some point above the attic access or the space above is more than 30 square feet. Requiring anything less would result in many attics being considered inaccessible even when constructed per current code, wording is taken from the section mentioned. A look could also be made backward through the codes to see from what measurements this requirement noted in R807 evolved and the smaller of the two be used as many of older houses built to older codes are still around today.

In point 4, now deleted - the 115 degree requirement for an attic seems unrealistic as well. At that temp measures taken to be hydrated. We must also consider that in areas like Phoenix and other areas temperatures outside during the summer will often exceed 115 degrees and people still work outside and in attics as well. We could simply leave this out as this is also already covered under the newly proposed addition to A.3.3.1 Accessible (for Inspections) where it says "Access does not require the inspector to enter areas that, in the professional judgment of the inspector, likely will be hazardous to the inspector, other persons, or the property."

In point 5, now point 3, current code in the IRC in Figure R403.1(3) shows that a minimum 18" distance is required between the floor joists and the ground beneath inside the crawlspace, as such no measurement should be larger than this... A look could also be made backward through the codes to see from what measurements this requirement evolved and the smaller of the two be used as many of older houses built to older codes are still around today.

Also added a note about common dwelling units where access cannot be obtained

Related Item

- A.3.3.48 Concealed (Inaccessible)

Submitter Information Verification

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Submittal Date: Wed Mar 02 15:40:35 EST 2022

Committee: CHI-AAA

Committee Statement

Committee Action: Rejected

Resolution: The current annex text is preferred as the numbers from the first draft where what the committee could come to a consensus on.