



Public Comment No. 9-NFPA 96-2022 [Section No. 2.2]

2.2 NFPA Publications.

National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02169-7471.

NFPA 10, *Standard for Portable Fire Extinguishers*, 2022 [edition](#).

NFPA 12, *Standard on Carbon Dioxide Extinguishing Systems*, 2022 [edition](#).

NFPA 13, *Standard for the Installation of Sprinkler Systems*, 2022 [edition](#).

NFPA 17, *Standard for Dry Chemical Extinguishing Systems*, 2024 [edition](#).

NFPA 17A, *Standard for Wet Chemical Extinguishing Systems*, 2024 [edition](#).

NFPA 54, *National Fuel Gas Code*, 2024 [edition](#).

NFPA 58, *Liquefied Petroleum Gas Code*, 2023 [edition](#).

NFPA 70[®], *National Electrical Code*[®], 2023 [edition](#).

NFPA 72[®], *National Fire Alarm and Signaling Code*[®], 2022 [edition](#).

NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, 2022 [edition](#).

NFPA 102, *Standard for Grandstands, Folding and Telescopic Seating, Tents, and Membrane Structures*, 2021 [edition](#).

NFPA 211, *Standard for Chimneys, Fireplaces, Vents, and Solid Fuel-Burning Appliances*, 2024 [edition](#).

NFPA 259, *Standard Test Method for Potential Heat of Building Materials*, 2023 [edition](#).

NFPA 750, *Standard on Water Mist Fire Protection Systems*, 2023 [edition](#).

NFPA 770, *Standard on Hybrid (Water and Inert Gas) Fire Extinguishing Systems*, 2021 [edition](#).

NFPA 1192, *Standard on Recreational Vehicles*, 2021 [edition](#).

Statement of Problem and Substantiation for Public Comment

See public comment 8 to add NFPA 770 to 10.2.6

Related Item

- PI 8

Submitter Information Verification

Submitter Full Name: Ryan Smale

Organization: Victaulic

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 31 10:03:41 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Action: Accepted

Resolution: [SR-1-NFPA 96-2022](#)

Statement: Include NFPA 770 in chapter 2.



Public Comment No. 6-NFPA 96-2022 [Section No. 4.1.2]

4.1.2

All such equipment and its performance shall be maintained in accordance with the requirements of this standard and the equipment manufacturer during all periods of operation of the cooking equipment.

Statement of Problem and Substantiation for Public Comment

Cooking equipment needs to be maintained in accordance with the standard and any and all specific requirements that the manufacturer may have. These requirement may be more explicit than the general requirements in the standard. Cooking equipment manufacturer's requirements may change between editions of this standard and the standard needs to recognize that the manufacturer's listing process should be included in the standard. The technical committee didn't disagree with this during the public input for PI-19, but stated that the solid fuel cooking equipment shouldn't be singled out. This section (4.1.2) is in reference to all cooking equipment.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 5-NFPA 96-2022 [Section No. 4.1.6]	Same type of requirement in 4.1.6 as is in 4.1.2
Public Comment No. 5-NFPA 96-2022 [Section No. 4.1.6]	

Related Item

- Public Input No. 19

Submitter Information Verification

Submitter Full Name: Scott Futrell
Organization: Futrell Fire Consult & Design, Inc.
Street Address:
City:
State:
Zip:
Submittal Date: Wed Apr 13 11:53:57 EDT 2022
Committee: VEN-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The requirement of equipment manufacturer is not clear. Where cooking equipment manufacturers requirements change between editions they should not automatically become requirements without prior review by the technical committee. Equipment manufacturers requirements are not held to a consensus style review process. A task group has been developed to create clearer language.



Public Comment No. 7-NFPA 96-2022 [New Section after 4.1.5]

4.1.5.1

Records shall be maintained on the premises for all inspection, testing, cleaning, and repairs of systems and equipment.

Statement of Problem and Substantiation for Public Comment

The owner / operator does not realize the need to keep and maintain records for all work associated with the fire protection and kitchen exhaust related systems. These records are necessary for comparison of not only the inspection, testing, maintenance, and repair work performed, but also of the repairs and cleaning of hoods, ducts, and fans. The committee said that additional requirements aren't necessary because reporting and records are dealt with elsewhere in the standard and in extinguishing system standards. The reality is they are not dealt elsewhere in this standard for extinguishing systems or repairs, they belong in this section of general requirements, and the requirements to owners and operators needs to be reinforced.

Related Item

- Public Input No. 22

Submitter Information Verification

Submitter Full Name: Scott Futrell

Organization: Futrell Fire Consult & Design, Inc.

Street Address:

City:

State:

Zip:

Submittal Date: Wed Apr 13 12:50:16 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Action: Rejected

Resolution: A task group reviewed and clarified the requirements in regards to records for inspection, testing, and cleaning of the exhaust system in chapter 12. Requirements regarding records for extinguishing systems are covered in the respective NFPA extinguishing systems standards. A task group has been assigned to review these requirements.



Public Comment No. 5-NFPA 96-2022 [Section No. 4.1.6]

4.1.6*

All solid fuel cooking equipment shall comply with the requirements of Chapter 15 and all of the manufacturer's requirements .

Statement of Problem and Substantiation for Public Comment

Cooking equipment needs to be maintained in accordance with the standard and any and all specific requirements that the manufacturer may have. These requirement may be more explicit than the general requirements in the standard. Solid fuel burning equipment manufacturer's requirements may change between editions of this standard and the standard needs to recognize that the manufacturer's listing process should be included in the standard. The technical committee didn't disagree with this during the public input, but stated that the solid fuel cooking equipment shouldn't be singled out. This section (4.1.6) is in reference to solid fuel cooking ONLY and does not reflect on other cooking equipment requirements elsewhere in the standard.

Related Public Comments for This Document

Related Comment

[Public Comment No. 6-NFPA 96-2022 \[Section No. 4.1.2\]](#)

[Public Comment No. 6-NFPA 96-2022 \[Section No. 4.1.2\]](#)

Relationship

Added similar language to 4.1.2

Related Item

- Public Input No. 19

Submitter Information Verification

Submitter Full Name: Scott Futrell

Organization: Futrell Fire Consult & Design, Inc.

Street Address:

City:

State:

Zip:

Submittal Date: Wed Apr 13 11:43:26 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Action: Rejected

Resolution: The requirement of equipment manufacturer is not clear. Where cooking equipment manufacturers requirements change between editions they should not automatically become requirements without prior review by the technical committee. Equipment manufacturers requirements are not held to a consensus style review process. A task group has been developed to create clearer language.



Public Comment No. 8-NFPA 96-2022 [Section No. 10.2.6]

10.2.6

Automatic fire-extinguishing systems shall be installed in accordance with the terms of their listing, the manufacturer's instructions, and the following standards where applicable:

- (1) NFPA 12
- (2) NFPA 13
- (3) NFPA 17
- (4) NFPA 17A
- (5) NFPA 750
- (6) NFPA 770

Statement of Problem and Substantiation for Public Comment

NFPA 770, Standard on Hybrid (Water and Inert Gas) Fire Extinguishing Systems has been recently published as a 2021 NFPA standard. Hybrid systems can be used as an effective fire extinguishing method for the fuels/hazards present in this standard.

Related Item

- PI 9

Submitter Information Verification

Submitter Full Name: Ryan Smale

Organization: Victaulic

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 31 09:57:28 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Action: Accepted

Resolution: SR-3-NFPA 96-2022

Statement: NFPA 770, Standard on Hybrid (Water and Inert Gas) Fire Extinguishing Systems has been recently published as a 2021 NFPA standard. Hybrid systems can be used as an effective fire extinguishing method for the fuels/hazards present in this standard.

**Public Comment No. 1-NFPA 96-2022 [Section No. 12.4]****12.4*** Inspection for Grease Buildup.

The entire exhaust system shall be inspected for grease buildup by a properly trained, ~~qualified and qualified~~, ~~and certified~~ person(s) acceptable to the authority having jurisdiction and in accordance with Table 12.4.

Table 12.4 Schedule of Inspection for Grease Buildup

<u>Type or Volume</u>	<u>Inspection</u>
<u>of Cooking</u>	<u>Frequency</u>
Systems serving solid fuel cooking operations	Monthly
*Systems serving high-volume cooking operations	Quarterly
Systems serving moderate-volume cooking operations	Semiannually
†Systems serving low-volume cooking operations	Annually

*High-volume cooking operations include 24-hour cooking, charbroiling, and wok cooking.

†Low-volume cooking operations include churches, day camps, seasonal businesses, and senior centers.

Statement of Problem and Substantiation for Public Comment

Inspections need not be performed by a certified person, rather a person qualified through training to inspect for grease build up. Explanation for 12.4 indicates the inspection purpose is to identify when grease build-up requires cleaning. My experience, thought limited, is the companies are in the business of cleaning not inspecting. No special training is really needed to determine grease depth requires cleaning,(2,000 microns or 2 millimeters) one can do this by laying a US nickle on the hard surface for comparison to grease depth. If grease is thicker than the nickle, cleaning is prescribed. If not, no cleaning is required.

Requiring certified persons to inspect this when no such requirements are contained in other standards and codes is inconsistent. Nothing in NFPA 652 or 654 requires specific training to inspect for accumulations of combustible/explosive dust, however that situation poses much greater concern for life safety than grease in a duct.

Initial inspections should identify compliance with building codes and issues with cleaning, i.e.difficult spots to reach. Recent fires I am familiar with resulted when "cleaners" failed to clean hard to access areas but reported the system was fully cleaned. These were, to my belief, trained and certified cleaners but failed to adequately address cleaning operations.

Related Item

- PI

Submitter Information Verification

Submitter Full Name: James Pharr

Organization: Eastern Kentucky Univ

Street Address:

City:

State:

Zip:

Submittal Date: Fri Mar 18 11:37:21 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Rejected

Action:

Resolution: This minimum requirement does not preclude an individual to perform an inspection on their own. Further, the suggested changes are new material and has not gone the process.



Public Comment No. 4-NFPA 96-2022 [New Section after 17.4]

TITLE OF NEW CONTENT

17.4.6 electric ignitors

Statement of Problem and Substantiation for Public Comment

Prevent the build up of LPG vapors when igniting the LPG cooking appliances on the burns.

Related Item

- FR-56

Submitter Information Verification

Submitter Full Name: George Cluff

Organization: Rio Rico Medical and Fire District

Affiliation: Rio Rico Medical and Fire District

Street Address:

City:

State:

Zip:

Submittal Date: Thu Mar 24 19:40:38 EDT 2022

Committee: VEN-AAA

Committee Statement

Committee Rejected

Action:

Resolution: The public comment is just a title with no other requirements involved and does not make sense in the sequence of section 17.4