

NFPA STANDARDS COUNCIL MEETING

ONE BATTERYMARCH PARK

QUINCY, MASSACHUSETTS

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1 PROCEEDINGS

2 THE CHAIRPERSON: Good afternoon everyone.

3 Welcome to the afternoon edition of the NFPA Standards

4 Council meeting. We are on Agenda Item 11-8-15 A2 which

5 deals with NFPA 2112. We are going to have everyone in the

6 room introduce themselves in a moment for the record. We

7 want everyone to note that we are doing a transcript of

8 these proceedings, so it's very important that when you

9 speak you preface your remarks by your name and your

10 affiliation so we insure that the record accurately

11 reflects the remarks that are made.

12 I'm going to go around the table and ask

13 members of the Council to introduce themselves, and then

14 I'll ask everyone else around the room. My name is Jim

15 Pauley, Chairman of the Standards Council.

16 MS. CRONIN: Amy Cronin, NFPA staff and

17 Standards Council secretary.

18 MS. FULLER: Linda Fuller, NFPA staff.

19 MR. HARRINGTON: J. C. Harrington, member

20 of Council.

21 MR. MILKE: Jim Milke, member of Council.

22 MR. LEBER: Fred Leber, member of

23 Council.

1 MR. DEMERS: David Demers, member of the
2 Standards Council.

3 MR. JARDIN: Joseph Jardin, member of
4 Council.

5 MR. McDANIEL: Danny McDaniel, member of
6 Council.

7 MR. SNYDER: Michael Snyder, member of
8 Council.

9 MR OWEN: Richard Owen, member of the
10 Council.

11 MR. CLARY: S. M. Clary, member of
12 Council.

13 MR. BELL: Kerry Bell, member of Council,
14 and for the record, I will be recusing myself on this
15 Agenda Item and will not be participating in the hearing,
16 in deliberations or voting on this item.

17 MS. BRODOFF: Maureen Brodoff, NFPA staff
18 and legal counsel for the Standards Council.

19 MR. FINNEGAN: Daniel Finnegan, Siemens
20 Industry, guest.

21 MR. DUBAY: Christian Dubay, NFPA staff.

22 MR. TOLMAN: Robert Tolman, NFPA.

23 MR. GOLINVEAUX: James Golinveaux, Tyco.

1 MR. COLONNA: Guy Colonna, NFPA staff.

2 MS. STANEK: Sandra Stanek, NFPA staff.

3 MR. HART: John Hart, NFPA staff.

4 MS. GOLINVEAUX: Tracy Golinveaux, NFPA
5 staff.

6 MR. KLAUS: Matt Klaus, NFPA staff.

7 MR. DUFFY: Chad Duffy, NFPA staff.

8 MS. STULL: Grace Stull, International
9 Personal Protection.

10 MR. STULL: Jeff Stull, International
11 Personal Protection.

12 MR. CORRADO: Steve Corrado, Underwriters
13 Lab.

14 MS. GLEASON: Pat Gleason, Safety
15 Equipment Institute.

16 MR. SCHULTE: Rich Schulte, Schulte &
17 Associates.

18 MR. HUGGINS: Roland Huggins, member of
19 Council.

20 THE CHAIRPERSON: If anybody else has
21 come in please.

22 MR. DUVAL: Derek Duval, NFPA.

23 MS. BEACH: Denise Beach, NFPA.

1 THE CHAIRPERSON: Did I get everybody?

2 MR. SCHAEFER: August Schaefer,

3 Underwriters Laboratories.

4 THE CHAIRPERSON: Okay, for this

5 particular Agenda Item, I just want to get a reading on,

6 Mr. Schaefer, you're speaking on this particular item. Who

7 is speaking on behalf of the appellants in this case?

8 Mr. Stull, is it?

9 MR. STULL: Yes.

10 THE CHAIRPERSON: And?

11 MS. GLEASON: And Pat Gleason.

12 THE CHAIRPERSON: And Pat Gleason, okay.

13 And Mr. Schaefer, you're speaking as a respondent on the

14 appeals --

15 MR. SCHAEFER: Yes.

16 THE CHAIRPERSON: -- in opposition to the

17 appeals? Anyone else speaking in opposition to the

18 appeals? Okay, the way we will do the hearing is I'm going

19 to give the appellants about 10 minutes to do their opening

20 remarks that they want to make. You can utilize that ten

21 minutes to sort of summarize your appeal, provide any other

22 information to the Council. I'll ask the respondent, I'll

23 give them 10 minutes as well to do that, then I'll go to

1 the Standards Council for any questions from members of the
2 Standards Council.

3 When we wrap up with those, I'll give
4 each side about five minutes for any closing remarks that
5 they may have, and that's how we'll close out the hearing.
6 Mr. Stull is the appellant. I'm going to turn the floor
7 over to you first, and again, if you and Ms. Gleason both,
8 if you'll kind of use that ten minutes together on the
9 appeals side, feel free to do that however you like. So if
10 you'd like to come to the table also, that's fine.

11 MR. STULL: Thank you. I want to speak
12 against an appeal of the floor motion that was approved at
13 the recent annual meeting. Grace and I are from
14 International Personal Protection. We're a company that
15 provides research expertise in the area of personal
16 protective equipment and have done so for the last
17 20 years.

18 I want to describe before we get into the
19 matter what this issue is all about. It's about a subject
20 called component recognition. Essentially in our project,
21 a project to do with personal protective equipment, there
22 are requirements for the third-party certification of
23 products. Many of those products contain parts, pieces,

1 things that are not full products that get evaluated and
2 tested.

3 Component recognition is a system or
4 practice which allows for the testing of those components
5 or parts or pieces to the applicable portions of the
6 standard. Now, Underwriters Laboratory devised a process
7 called component recognition. It's a listing process that
8 they use, but it's not product certification, but it has a
9 tremendous impact on the certification process.

10 And the reason it has an impact is many
11 of the products, mainly garments in our industry, have lots
12 of parts and pieces that get tested, and those parts and
13 pieces can be separately evaluated, and then that
14 information can be used by a multitude of different
15 manufacturers that make the same product; hence,
16 shortcutting the cost and the requirement that each product
17 manufacturer certify and to undertake all the tests on
18 their own.

19 So this process is one that we believe
20 serves the industry well. The problem that's developed is
21 that it's not a formalized process; it's part of
22 certification. This, our standards for NFPA products not
23 only at 2112 but on the project for fire and emergency

1 services protective clothing and equipment have extensive
2 sections on product certification.

3 This is example 1971. This standard has
4 five pages of certification requirements. It's not just
5 that the certification organization has to meet some ISO
6 standard or some other requirement. We have written
7 extensively within the committee's criteria to provide the
8 basis for how products are certified, but we haven't
9 addressed component recognition.

10 So why is this important for us to do
11 this now? Every time I was -- myself has been a member of
12 these committees on product standards for the last 25 plus
13 years, 30 years almost. Every time we had some
14 understanding of what we thought was going on in the
15 certification process we would learn different at a
16 meeting, and this is back at the time when Rich Duffy was
17 chairman of the Technical Correlating Committee as well as
18 the Technical Committees responsible for the products, we
19 would have to go and write requirements to provide the
20 criteria and expectation of what we expect to receive.

21 And such is the case now for component
22 recognition. What we've established are criteria which
23 essentially allows for the interrelationship between

1 organizations, fully qualified organizations that test and
2 validate that components or parts or pieces of products
3 meet the standard and that that information can in turn be
4 used by other certification organizations.

5 Well, you might say well, that's already
6 doable. Well, the fact is that that's not already doable
7 because certain certification organizations have chosen not
8 to accept data and information from other certification
9 organizations fully qualified meeting all of the
10 requirements.

11 So I want to direct your attention to a
12 document that I provided which is 11-8-15-8-2 which
13 provides an outline on the component recognition process.
14 Now, what I want to describe to you is how this ensued
15 through the ROP, the ROC and NITMAN in a relatively short
16 period of time.

17 Essentially, the committee went through a
18 very deliberate process to come up with language that
19 reflected not only what was happening but what the
20 committee intended to happen. And this is with almost near
21 unanimous acceptance by the committee members, and that was
22 to put together criteria that sets how component
23 recognition occurs and how that information is exchanged.

1 In the ROP process, the proposal was put
2 forth by Pat Gleason and that proposal was adapted, and, in
3 fact, there was a question even then from the staff liaison
4 that went to legal, got a determination and said is this
5 something we can do, and the answer came back yes, we can
6 do this. The action was to require that one certification
7 organization be able to accept the information from another
8 certification organization but not just in a strict sense
9 like that.

10 Where we ended up with this is in our
11 report on comments. Proposals were made that it should be
12 a shall permit in a permissive sense. We said no, we don't
13 want that because still the certification organization
14 could say no, we don't like you, we're not going to accept
15 your data.

16 So we took the additional step of putting
17 in -- and this is something I want to underline that's part
18 of the information provided on the documents that are
19 provided for you as part of the agenda package -- is that
20 the receiving organization has the ability to dictate
21 exactly what else that providing certification organization
22 has to meet. So not only does the relationship have to
23 meet all the base requirements in the standard but the

1 certification organization which is accepting the
2 information can impose its requirements as well.

3 And here's why this is important to me:

4 At the annual meeting statements were made that said we
5 have no control, or they said that, well, we're going to be
6 forced to accept information that we have, we don't know
7 whether it's acceptable or not or we won't have access to
8 information. These kinds of statements were made as part
9 of the annual meeting and they're blatantly false because
10 we have empowered, the committee has empowered the
11 certification organization to demand to have any
12 organization from which it accepts data to meet its own
13 requirements. We just want this to happen. We just don't
14 want this to be a casual reason for discarding one
15 organization's information.

16 So why is this important? It's important
17 because this industry is extensively based on component
18 testing. It affects the prices of products dramatically,
19 and, but at the same time the committees have endeavored to
20 put in the most stringent criteria for qualifying
21 certification organizations for how the testing is done,
22 for how long that information is disclosed. All that is
23 part of our criteria. And, in fact, once NITMAN was, of

1 course, held and voted on at the annual meeting, this, of
2 course, was probably through a ballot to the Technical
3 Committee, the Technical Committee did not agree, the
4 ballot with the action on the floor of the annual meeting.

5 I just want to bring up two points before
6 I'll turn it over to Pat Gleason. I think personally that
7 the NITMAN process might be partly flawed. The reason I
8 think it's flawed is I've been a member of NFPA for many,
9 many years. I've been involved in writing pages and pages
10 and pages of text, but the issue I saw in this NITMAN
11 process was of a concern to me, and that is someone can
12 make a motion but they don't have to provide a
13 justification. So as an income, as someone trying to
14 respond to that have no idea where that person is coming
15 from until they actually voice their actions or their basis
16 for the statement at the annual meeting which gives me no
17 opportunity to prepare. I think that the NFPA should
18 require that NITMAN not only have the motion being made but
19 the substantiation or basis for why that motion is being
20 made in the first place.

21 The second thing I want to bring up as a
22 concern that I'm going to be discussing with NFPA staff is,
23 even though it creates some awkwardness in this particular

1 situation, is the appointment of chairs, chairpersons.
2 Right now it's kind of a behind-the-scenes thing, and I
3 don't think that's what NFPA intends. The chairman is
4 appointed by the outgoing chairman and with the assistance
5 of staff.

6 I have had three occasions in the last
7 year -- I'm sorry, excuse me. They're recommended to the
8 Standards Council and the Standards Council makes the
9 decision. I've had three occasions in the last year which
10 I had no knowledge about a new chairperson being --

11 THE CHAIRPERSON: Mr. Stull, I just want to
12 let you know there's about a minute left and others want to
13 speak also. I should have done this at the beginning but
14 could you state your name and who you represent for the
15 record. I should have had you do that at the beginning of
16 your remarks.

17 MR. STULL: Sure, Jeffrey Stull,
18 International Personal Protection.

19 THE CHAIRPERSON: Thank you.

20 MS. GLEASON: I am Pat Gleason with the
21 Safety Equipment Institute, and we're the organization that
22 submitted the original proposal for the component
23 recognition process. With the stringent certification

1 requirements captured in 2112, several companies approached
2 SEI with their frustration of not being able to have other
3 certification organizations accept their material as a
4 component in an end garment certification. The material
5 supplier had gone through the entire certification process
6 including full testing for that particular component
7 material as well as going through a quality audit process
8 at their manufacturing plant, all of which were in
9 compliance with NFPA standard as well as fall under the ISO
10 Guide 65 accredited certification process.

11 With the language that's been approved by
12 the NFPA 2112 TC on two separate occasions, it sets forth
13 specific requirements on how a component recognition
14 program should work, basically, the prescriptive
15 requirements that Jeff mentioned already in place in the
16 standard that apply to component certification recognition.
17 The identical rules that apply to certification
18 organization also apply to the organization providing the
19 component recognition. Accreditation to ISO Guide 65, the
20 laboratory must comply with ISO 17025, and the component
21 manufacturer must be audited and the material must be
22 tested annually.

23 So the language proposed for 2112 was

1 based on a full review of the TC with input from a diverse
2 membership. The language in question gives the
3 certification organization, in my opinion, complete control
4 over the end product certification. The specifics in the
5 ROC and the ROP state that the organization shall meet
6 requirements of Section 4.2, which is that chapter within
7 the standards specific to certification requirements. It's
8 extensive and it's prescriptive, and we thought with the
9 new language the end product manufacturer would submit to a
10 certification organization a request to utilize the
11 material that has been, has completed an entire
12 certification process in accordance with these
13 requirements.

14 The certification organization shall then
15 accept the component recognition if the organization meets
16 all the requirements stated in the standard, provides the
17 required evidence of conformity and meets the requirements
18 of the end product certifier.

19 In my opinion, there's no forcing any
20 certification organization to accept component recognition.
21 SEI has been faced with numerous situations in our history
22 where we were unable to accept a material or component
23 because of either incomplete data, a lack of 17025

1 accreditation by the testing laboratory or some other
2 reason. The language that we have in the 2112 standard
3 allows for that.

4 However, if all requirements for
5 component recognition are met, it makes absolute sense to
6 have that data shared between end product manufacturers
7 because it does help bring the cost of certification down
8 and ultimately the price of these products to the fire
9 service.

10 In SEI's case, we stand behind our
11 legally registered mark, we have liability insurance and we
12 require all manufacturers, as part of our program, to
13 maintain liability insurance as well. It's required by ISO
14 Guide 65, and ANSI, our accreditor, requires that SEI take
15 full responsibility, as any other ISO Guide 65 accredited
16 organization, must take full responsibility for our
17 certifications. We don't have any intention of
18 compromising our integrity, and we don't expect any other
19 organization to do so either.

20 THE CHAIRPERSON: You have about a minute to
21 try to wrap up please.

22 MS. GLEASON: It will take 30 seconds.

23 THE CHAIRPERSON: Okay.

1 MS. GLEASON: The approved language is strong
2 and has built-in safeguards to maintain the best possible
3 products are brought to market by only reputable
4 certification organizations.

5 THE CHAIRPERSON: All right, thank you.
6 Mr. Schaefer, do you want to take your time please for
7 opening remarks?

8 MR. SCHAEFER: Council members, good
9 afternoon. My name is August Schaefer, and I'm the senior
10 vice president and public safety officer with Underwriters
11 Laboratories, and we appreciate the opportunity to speak
12 with you today about what we consider a very important
13 matter and present our position.

14 The language being proposed for NFPA 2012
15 is problematic for many reasons, the first of which being
16 that it's simply not appropriate or necessary for inclusion
17 in a product standard. A certification organization may
18 accept data or recognition from another certification
19 organization if they choose to do so. But that choice
20 should strictly be up to the end product certification
21 organization to administer the program in a manner that
22 maintains the integrity of the certification and is not
23 mandated by an end product standard.

1 This language would, by way of a product
2 standard, require the certification organization to assume
3 the legal liability for the work done by someone else with
4 whom they have little or no association nor knowledge nor
5 control of their practices. We are not aware of any other
6 product standard that would, in effect, force commercial
7 trade conditions upon certification organizations. Such a
8 requirement in a standard raises serious legal issues with
9 respect to how and with whom a company conducts its
10 business.

11 This leads me to our second point. We
12 believe the proposed language is in violation of the ANSI
13 Essential Requirements. The ANSI Essential Requirements:
14 Due process requirements for American National Standards,
15 Section 3.2 Normative American National Standards Policies,
16 Commercial Terms and Conditions reads as follows: In
17 connection with standards that relate to the determination
18 of whether products or services conform to one or more
19 standards, the process or criteria for determining
20 conformity can be standardized as long as a description of
21 the process or criteria is limited to technical and
22 engineering concerns and does not include what would
23 otherwise be a commercial term. We believe the proposed

1 requirements to NFPA 2012, in effect, mandates commercial
2 criteria for the determination of conformity.

3 Again, this language, by requiring a
4 program to essentially replace the organization's own
5 certification of components, could be interpreted as
6 forcing a commercial relationship between competitors. In
7 essence, NFPA would be forcing certification organizations
8 to have a business relationship with their competitors.
9 This language would intentionally interfere with how a
10 certification organization performs its service as well as
11 with whom it chooses to do business to provide its service
12 or chooses not to do business with.

13 A third point relates to a concern that
14 the surveillance or follow-up activities to the initial
15 product qualification could become compromised. With the
16 proposed language, a certification organization would be
17 required to accept both the initial testing and the ongoing
18 surveillance or the follow-up of a component certified or
19 recognized by another certification organization.

20 With this proposed language, the ability
21 of the end product certification organization to establish
22 a contractual agreement with the component manufacturer is
23 compromised. In other words, UL, when it certifies a

1 recognized component, enters into a contract with that
2 component manufacturer directly. We believe this may
3 result in a breakdown of the surveillance and traceability
4 of the recognized component. Consequently, the end product
5 certification organization may be exposed to liability for
6 end product failures associated with the component that's
7 been utilized in the end product that they certify.

8 For example, if there's a deficiency
9 discovered with a component certified by another
10 certification organization, the end product certifier might
11 not be notified since there would not be necessarily a
12 relationship between the competing certification bodies to
13 provide such notification, and therefore, the end product
14 certifier may not be able to take appropriate action to
15 inform the users and the public of a potential safety
16 issue. The unintended consequence of these proposed
17 requirements could create gaps in follow-up surveillance
18 between the components and the end products where they are
19 utilized.

20 Another important point to consider is
21 the quality and intensity of the certification process used
22 by the various certification organizations. All
23 certification organizations are not equal. While two

1 certification organizations may meet the same minimum
2 accreditation criteria, the nature and extent of the
3 service they provide can be vastly different, much like any
4 type of service offered to the marketplace.

5 For example, the number of inspections
6 conducted per year as well as the content and the nature of
7 the inspections at the factories where components are made
8 can vary significantly. Certification organizations can
9 also vary in their experience and expertise with various
10 product types and competency of their personnel. All of
11 these things are important considerations when making the
12 certification decision for an end product.

13 This proposed mandatory language may lead
14 to a lack of confidence in the end product certification.
15 The responsibility to certify a product lies solely with
16 the end product certification organization. As part of
17 that decision, the certification organization must be
18 confident in the components that are utilized in the end
19 product and that they're acceptable in every way. That's
20 the reason UL originated the recognized component program.
21 If there's no level of oversight over the component
22 certification, there cannot be full confidence in the end
23 product's compliance by the certification organization.

1 Unfortunately, users of these products
2 could be adversely affected by these inappropriate
3 criteria. Should this proposed language be implemented,
4 end users of the product, who have come to rely on the
5 certification mark on the product itself in making their
6 purchasing decisions, could be adversely affected.

7 End users assume that the certification
8 mark on the end product means that that organization, this
9 mark appears for the entire certification of the product.
10 In turn, as I indicated earlier, the certification
11 organization must have the confidence in the components and
12 end products that they meet the appropriate requirements.
13 Claiming a product meets the requirements in a standard
14 speaks nothing to the quality and integrity of the work
15 that goes into the certification decision.

16 Furthermore, the industry standards that
17 govern product certification and testing organizations only
18 require that they have certain processes and systems in
19 place. These are accreditation criteria. Accreditation to
20 these standards affords no guarantee that sound engineering
21 judgments and correct certification decisions are made or
22 ultimately that a product meets the requirements.

23 End users have the right to know that the

1 components of the products were subjected to the
2 comprehensive testing and surveillance by the organization
3 whose certification mark appears on a product. They also
4 should have the right to choose products that are certified
5 in their entirety by the companies that they have come to
6 trust.

7 The proposed language may lead to
8 increased liability for the end product certification
9 organization by taking control of the full certification
10 process out of the end product certifier's hands. There
11 are several potential consequences that can result from
12 this. If the certified product fails to meet the user's
13 expectations, particularly where an injury or a loss of
14 life is involved, legal claims may be asserted against both
15 the manufacturer and the organization whose certification
16 mark appears on the end product.

17 To manage this potential liability, the
18 certifying organization must be able to defend itself by
19 showing that the conformity assessment process was followed
20 and technically sound engineering judgments and
21 certification decisions were made. If the certification
22 organization is not in control of the conformity assessment
23 process, however, the certifying organization may be

1 subjected to unmanageable, uninsurable, and ultimately
2 unacceptable legal risk.

3 By accepting the components tested by
4 another organization, the end product certifier assumes all
5 responsibility and legal risks for that component, and as
6 such should have the ability to set the terms and
7 conditions of component acceptance and who it chooses to do
8 business with. It could also be argued that by NFPA
9 placing such a requirement in their codes and standards
10 that NFPA may be assuming the liabilities which accompany
11 such a requirement.

12 In closing, I'd also like to point out
13 that contrary to what you may have been led to believe
14 there is a healthy competition between certification
15 organizations. I believe the arguments presented to you
16 today make it very clear that it's not appropriate to
17 include a requirement in an end product certification, for
18 an end product certification organization to accept a
19 component certified by another organization in NFPA 2012 or
20 in any other published NFPA standard.

21 This requirement does not comply with
22 ANSI Essential Requirements. It would inappropriately
23 require a commercial relationship to be established between

1 competitors, and many of you work for companies where you
2 have competitors and very rarely do you see any type of
3 requirement that forces you to work with a competitor,
4 accept information from a competitor, accept anything from
5 a competitor; it's just not appropriate in an end product
6 standard.

7 It may expose end product certification
8 organizations to increase liability; and finally, it may
9 compromise the safety of the products made available to the
10 marketplace. So thank you for your time to present our
11 position and I look forward to the committee's review.

12 THE CHAIRPERSON: Thank you. At this point
13 I'm going to open it up to questions from members of the
14 Standards Council. Mr. Harrington.

15 MR. HARRINGTON: J. C. Harrington, member of
16 Council. I have a question for Mr. Stull. I just would
17 like you to comment on, we just heard a discussion from the
18 gentleman of UL as far as his view that certification
19 organizations are very different and a level of effort from
20 one to another may be different, and I would just like to
21 listen to your take or opinion on that.

22 MR. STULL: I don't agree with that
23 statement. The reason is we have, as I pointed out in my

1 presentation, my delivery, extensive requirements for, that
2 are specified. In fact, when we first embraced third-party
3 certification as part of product standards, and this is a
4 huge leap and I can say that because I've been involved
5 with ASTM and ISO and all the other processes for European
6 standards, we have by far the most rigorous requirements
7 for certification for any type of product at least in our
8 industry that I know of.

9 There are some, there can be some
10 differences; for example, the standards may dictate the
11 number of surveillance audits, and UL has a practice of
12 their own to have four audits, and this isn't necessarily
13 something that the end user or rather the manufacturer of
14 product components do. This is what UL has as part of
15 their practice or program.

16 I don't agree. I think that we're seeing
17 quite good consistencies, there's a lot of interaction of
18 the certification organizations on the committees, and
19 these are very well-established organizations that are part
20 of this business.

21 THE CHAIRPERSON: Ms. Brodoff.

22 MS. BRODOFF: Mr. Stull, could you just state
23 for the record who you represent in any phases of this

1 process?

2 MR. STULL: Yes, I certainly will.

3 MS. BRODOFF: Because you mentioned that you,

4 well, your disclosure of representation as being a matter

5 of affiliation with National Personal Protection at this

6 hearing, but I'd be curious to know whether that's your

7 only affiliation or whether you have any --

8 MR. STULL: Yes, it is. Before, myself and

9 my wife, Grace Stull, as part of National Personal

10 Protection, had presented this issue and took part at the

11 annual meeting on behalf of a company known as TenCate.

12 TenCate is a company that is a major supplier of fabrics,

13 so our participation at that annual meeting was on their

14 behalf.

15 MS. BRODOFF: Are you saying now you're not

16 representing anyone?

17 MR. STULL: We are not representing TenCate,

18 that's right.

19 MS. BRODOFF: You have no interest other than

20 your own personal point of view?

21 MR. STULL: That's right.

22 MS. BRODOFF: I think that should have been

23 disclosed to the rest of the Council because I think you

1 clearly had a client interest on this matter and that's
2 something Council needs to know even if you're not being
3 retained to come here for that specific purpose.

4 MR. STULL: All right.

5 MS. BRODOFF: What interest do you serve on
6 the committee?

7 MR. STULL: Special expert.

8 MS. BRODOFF: So you're not a manufacturing
9 representative?

10 MR. STULL: No, I'm not.

11 MS. BRODOFF: Did you vote on this matter?

12 MR. STULL: On this matter?

13 MS. BRODOFF: Yes, on the proposal that
14 you're proposing now.

15 MR. STULL: I believe I did, yes.

16 MS. BRODOFF: And did you disclose any other
17 interests that you were serving at that time?

18 MR. STULL: I disclosed them at the annual
19 meeting.

20 MS. BRODOFF: Were you representing Mr.
21 TenCate or the TenCate organization at the time you were
22 serving on the committee?

23 MR. STULL: When the issue first came up,

1 yes, I would have been, yes.

2 MS. BRODOFF: Are you aware that you should
3 have disclosed it at that time?

4 MR. STULL: Yes, I am.

5 MS. BRODOFF: And not voted on the issue?

6 MR. STULL: Yes.

7 MS. BRODOFF: I have some other questions,
8 but on a different subject.

9 THE CHAIRPERSON: Are there additional
10 questions from members of the Council? Mr. Jardin.

11 MR. JARDIN: Joe Jardin, member of Council to
12 Mr. Stull. You held up a copy of the 1971 standard when
13 you were discussing the issue of the component
14 certification. Were you saying that right now in that
15 standard, the 1971 standard, that it incorporates what
16 you're proposing for 2112? I just want to clarify that.

17 MR. STULL: No, it's under consideration by
18 the Technical Correlating Committee which is a group that
19 oversees that particular project interest, but they have
20 not made any specific decision as to whether they're going
21 to go forward. They formed a task group for that matter.

22 MR. JARDIN: Thank you.

23 THE CHAIRPERSON: Additional questions? Jim

1 Pauley, chairman of the Council. I guess, the question
2 that I have, the argument that I seem to hear from both
3 sides is an issue that we have a product standard that has
4 specific certification requirements in it, and we seem to
5 be, what seems to be blending into this is a conformity
6 assessment related sort of issue on how you actually show
7 compliance with the standard.

8 Are there any other examples of, you
9 know, standards that you can tell me that have included
10 this sort of explicit conformity assessment requirements
11 into the standard to where, and particularly I'm talking
12 about any kind of accredited standard that would go
13 through, and if that's true, what kind of requirements are
14 we talking about.

15 MR. STULL: I can mention two instances.
16 NFPA 1981 right now has a requirement for self-contained
17 breathing apparatus. As part of their criteria, they have
18 a requirement for the acceptance of the government
19 certification of brush fighters; in this case
20 self-contained breathing apparatus. So the certification
21 organization has to accept that certification as part of
22 the prerequisite to be certified to NFPA 1981.

23 In a prior edition of NFPA 1977, which is

1 a standard on wild land firefighting protective clothing
2 and equipment, there is a requirement that shelters, these
3 are the devices that are deployed by firefighters as a last
4 ditch effort, meet federal requirements for a specific
5 federal specification. In fact, Underwriters Laboratory
6 was one of the organizations that would accept the
7 government information for that, government test
8 information as part of their certification without any
9 auditing or surveillance program on their behalf.

10 THE CHAIRPERSON: Mr. Schaefer, any comments
11 from your end?

12 MR. SCHAEFER: I can't speak specifically to
13 that standard, I'm just not familiar with it, but I can
14 tell you to the question of conformity assessment criteria
15 being included in standards. When I started at UL, and
16 this is 37 years ago now, UL was going through the process
17 of removing all the conformity assessment criteria from its
18 standards. We used to publish what we called our follow-up
19 inspection programs in the standard itself, and that
20 included information about what would happen during visits
21 to the factories, what testing would be done in a factory,
22 what samples would be selected for testing back at UL,
23 everything that we included in our entire product

1 certification program.

2 We removed that criteria because it was
3 our understanding, and we agreed, that to become ANSI
4 national standards the standards should not include the
5 product certification criteria in the standard itself. So
6 all that material was removed from our standards many years
7 ago, and whether it was required by ANSI or not, it was the
8 right thing to do because it's, in our opinion it's just
9 not appropriate to include what the certification
10 organization should do to maintain the integrity of its
11 mark, and what certification organizations decide to do to
12 maintain the integrity of their mark can vary. It's not
13 appropriate to include that in the standard itself.

14 THE CHAIRPERSON: Ms. Gleason, do you have a
15 comment on that point?

16 MR. GLEASON: I do, and what we have found is
17 in standards dealing with personal protective equipment
18 particularly is a bit unique in that there are numerous
19 standards that have been published not only by NFPA, and
20 virtually all of the standards that fall under the personal
21 protective equipment project all include conformity
22 assessment requirements and very, very specific, as we
23 mentioned earlier, but also the International Safety

1 Equipment Association who also publishes personal
2 protective equipment standards has included conformity
3 assessment requirements, as well as ASTM.

4 Again, these are all unique to the
5 industry of safety and protective equipment that's worn
6 primarily occupationally in order to protect workers
7 against, you know, potential hazards in the workplace, and
8 in virtually all of their standards there are conformity
9 assessment requirements, and in European standards, well,
10 in Europe there's the personal protective equipment
11 directive which specifies which type of products should
12 undergo either full testing or quality audits. It's
13 prescriptive for that particular industry.

14 In the U.S. we don't have anything like
15 that, and I feel as though originally when these
16 requirements were incorporated into the standards it was
17 because the industry wasn't looking for uniformity in the
18 type of products that they were going to wear as they were
19 going out fighting fires and putting their life on the
20 line, and so these standards are unique.

21 And, you know, it's not an electrical
22 type product that may, you know, just fade out if the
23 standard, you know, if it fails, and we are looking at

1 somebody who could lose their life if their SCBA wasn't
2 working. So again, that's why there's prescriptive
3 requirements in the NFPA standards for conformity
4 assessment because they don't exist elsewhere.

5 THE CHAIRPERSON: Additional questions from
6 members of the Council? Ms. Brodoff.

7 MS. BRODOFF: Maureen Brodoff. As I
8 understand it, and I think, Gus, you spoke to this, this
9 requirement would essentially require your competitor to
10 accept your component testing under certain circumstances.
11 How is that something that is standard, that the standards
12 should be regulating?

13 MR. SCHAEFER: I don't know how that would be
14 regulated.

15 MS. BRODOFF: Actually, I wasn't -- I kind of
16 know your answer. Ms Gleason, it seems to me that this
17 requirement as long as in some unspecified way a component
18 recognition organization meets the requirements of a
19 certification program, that they, that the certification
20 organization has to accept the testing by that component
21 recognition group in spite of the fact that it's a direct
22 competitor, and I'm just not aware of any standard that
23 would require that kind of commercial interaction among

1 competitors, whether it would be appropriate, but, so I
2 wanted you to comment on that since it just seems like an
3 unusual request.

4 MS. GLEASON: The standard does allow for a
5 process of essentially review of --

6 MS. BRODOFF: What is the process, is there
7 accreditation of certification organizations under this
8 4.2?

9 MS. GLEASON: Yes, a certification
10 organization has to be accredited to ISO Guide 65. If you
11 looked at ISO Guide 65, basically it's a template for how a
12 certification organization shall operate. It's extensive.
13 We have to have procedures in place for conflict of
14 interest. I mean there's just many, many, we've got to
15 have legal, you know, we have to have bylaws, Articles of
16 Incorporation. All these things are reviewed as a business
17 by the accrediting organization. We have to have
18 procedures for how we contract with each manufacturer who
19 we offer certification to. We have to have processes in
20 place for how we accept samples, how a quality audit is
21 conducted. There are, it's very prescriptive.

22 So we undergo audits on an annual basis
23 where ANSI comes in to our facility, reviews all of our

1 product, our procedures for product certification. They
2 additionally go out and they observe us when we are on
3 quality audits at manufacturing facilities where a
4 component would be manufactured or a full end product would
5 be manufactured.

6 Additionally, they look at the standard,
7 the NFPA standard which we certify to and bring close the
8 whole process when they come back in to conduct an audit.
9 They want to see how we're meeting all those requirements
10 that are specified in that particular NFPA standard.

11 So for us to then look at a report that
12 comes from another certification organization, the first
13 thing we want to see is are they ISO Guide 65 accredited.
14 If they are, then we check that off. There's a procedure
15 that we have internally within our organization for
16 acceptance of data from outside --

17 MS. BRODOFF: You didn't do that voluntarily
18 under the current circumstances; you're asking to compel UL
19 to accept your testament and as a direct competitor --

20 MS. GLEASON: It's our certification; not
21 just our testing.

22 MS. BRODOFF: I assume that you're
23 competitors for certification testing?

1 MS. GLEASON: We're friendly competitors,
2 yes.

3 MS. BRODOFF: So you're seeking a provision
4 in a standard that would compel that commercial
5 relationship between competitors, and I just want you to
6 comment on that specific issue of why should a standard be
7 regulated in those kind of commercial relationships?

8 MS. GLEASON: Well, when we've gone to the
9 extent that we have within these standards for trying to
10 have a level operating system for every certification
11 organization and a manufacturer comes to us and they have a
12 material that they've gone through a certification process
13 with us and an extensive certification process as you can
14 see in the NFPA standard, again, the process involves us
15 being accredited and us conducting testing, us conducting
16 audits, and that material can be used by numerous
17 manufacturers. Why should that manufacturer have to then
18 go to another organization and go through the exact same
19 process?

20 MS. BRODOFF: Let me come at it a slightly
21 different way. If UL chooses not to rely on its
22 competitors for component testing, do its own testing as a
23 result, charge more or do more testing that's required

1 because that in their business judgment is how they want to
2 conduct their business, a manufacturer is not compelled to
3 go to them, they can go directly to you for certification
4 and testing and yield whatever benefits, economic or
5 quality, that they can choose to get from you, isn't that
6 true?

7 MS. GLEASON: Yes, absolutely.

8 MS. BRODOFF: So there's no reason why anyone
9 has to go to UL if they find that their commercial approach
10 to this is insufficient.

11 MS. GLEASON: The only issue would be that if
12 they have other manufacturers of end products that they
13 want to supply their material to then basically they have
14 to pay for our certification process as well as the whole
15 process that UL would offer, and that's why we've developed
16 our own criteria for acceptance of test results from
17 another certification organization.

18 THE CHAIRPERSON: Do you have anything else?

19 MS. BRODOFF: No.

20 THE CHAIRPERSON: Jim Pauley, chair of the
21 Council. I just want to follow on that line of questioning
22 because you mentioned ISO Guide 65, and I'm going to ask
23 this question perhaps to both of you. Ms. Gleason, I'll

1 ask you first. Is there anything in your internal
2 procedures that you would say is above and beyond Guide 65?

3 MS. GLEASON: Well, Guide 65 is, like I said
4 before, it's a template for how a certification
5 organization should operate, and there are different types
6 of certification. Meaning there may be a certification
7 where it's literally one test and then no more testing.
8 The NFPA standard drives organizations to repeat testing
9 every year for the product as well as a quality audit.

10 So Guide 65 is a template for a
11 certification organization to have policies, procedures and
12 all the legal requirements needed for that business to
13 operate and to be financially, you know, operable. Where
14 we go beyond would be, for instance, for our certification
15 program, and I know UL has something similar too, we
16 require full annual testing of all products and all
17 components every year.

18 We additionally require a minimum of two
19 full quality assurance audits similar to an ISO 9,000
20 audit. We don't require an auditor to go in and review an
21 inspection checklist. It's a full audit from incoming,
22 receiving, all the way through the product being
23 manufactured to be shipped out, so --

1 THE CHAIRPERSON: Let me interrupt at this
2 point. So those things that you just named that are pretty
3 specific, are all of those elements that you require, are
4 those required in Guide 65 to do it that way?

5 MS. GLEASON: In Guide 65 what you have to do
6 is when you issue your certificate to the product
7 manufacturer you have to state what process you've used
8 within Guide 65. If it's a one-on test or it's a, you
9 know, Type 5, which is what we are and I know UL is because
10 we conduct the quality audits and the full annual testing,
11 so all of that is disclosed when we issue --

12 THE CHAIRPERSON: Well, I was kind of getting
13 into your specifics where you said you require twice a
14 year, you know, and you require full testing of all those
15 components, but I'm gathering out of the discussion that I
16 could take another certifier with a different set of
17 procedures that doesn't require full testing and only may
18 do one audit a year and still be Guide 65 compliant
19 provided they've written the procedures?

20 MS. GLEASON: Right, but they wouldn't be in
21 compliance with the NFPA standard.

22 THE CHAIRPERSON: So your premise is that
23 everything necessary is really outlined explicitly in the

1 standard --

2 MS. GLEASON: Correct.

3 THE CHAIRPERSON: -- to be able to do the
4 conformity assessment. I'll just take that same sort of
5 set of questions, Mr. Schaefer, and ask the same from your
6 perspective. Are you above and beyond Guide 65 or does
7 that sort of relate?

8 MR. SCHAEFER: We look at any accreditation
9 program that we have ourselves accredited to, whether it's
10 ANSI or whether it's OSHA, NRTL, whatever, those
11 requirements as a basic threshold. What we really focus on
12 is what do we need to do in any product category where we
13 certify to maintain the integrity of the UL mark, and
14 99 percent of the time and maybe 100 percent that goes well
15 beyond the threshold requirements in an accreditation
16 program, and that can vary, everything from the frequency
17 of our follow-up inspections to the type of samples that we
18 select when we go to the factory.

19 It can even vary and some of you might be
20 aware of this. We invest millions of dollars each year to
21 prevent the counterfeiting of the UL mark, just to make
22 certain that the end product that has UL mark can be
23 trusted, and the same holds true for a recognized

1 component.

2 We look at a recognized component as a
3 certified product. We set up the same exact type of
4 inspection documentation, we manage our frequency of
5 inspection the same way, we select samples and so on. So
6 any accreditation criteria we look at as a baseline, and we
7 go well beyond that baseline because it all comes down to
8 the integrity of the mark.

9 If I can just actually quote a statement.

10 These are the FAQs that appear on the OSHA website about
11 the NRTL program, and there's a statement here that I think
12 is relevant if I may. One issue that often surfaces is
13 whether a NRTL must accept the product testing
14 certifications or approvals of another NRTL. And this is
15 the type of subject we're speaking about. OSHA has no
16 authority to require such an acceptance. A NRTL may accept
17 the work output of another NRTL; however, this is solely a
18 business decision of each NRTL.

19 THE CHAIRPERSON: Jim Pauley, chair of the
20 Council. I'm going to sort of try to wrap up my piece of
21 this and what I was trying to understand. So, in essence,
22 this issue gets down to if your requirements were twice a
23 year to go do an audit but, Mr. Schaefer, your requirements

1 were four times a year based on your minimum threshold
2 point that you were making about that's what you believe,
3 this would essentially say you would accept the other
4 components even if it was only done twice a year, whatever
5 it was those procedures were, that's what you would accept?

6 And I'm not trying to get into two versus
7 four; I only used that as an example because it was brought
8 up, but I'm trying to simply understand what the range of
9 variation can be and still be in compliance with the Guide,
10 so I understand, Mr. Stull, you have a comment, but I'm
11 looking back at Ms. Gleason and Mr. Schaefer since they
12 kind of engaged in a conversation to make sure of sort of
13 what that range was, and maybe, you know, I don't know
14 enough specifically about any of this to get down into the
15 details, so I was trying to look for a more general way to
16 try to understand it from my perspective.

17 MS. GLEASON: Yea, I mean I think both
18 organizations go beyond Guide 65. First of all, if you
19 want to call the NFPA standard, it's almost a scheme for a
20 lot of the certification requirements, and so that
21 standard, the requirements in the standard drive what we
22 equally have to meet. And to me it equalizes those
23 requirements in our industry. I think it's relatively

1 prescriptive in terms of what each certification
2 organization has to do either for an end product or, again,
3 in the place of a component.

4 And just as Gus mentioned, we have the
5 same exact requirements in our program as well. We treat a
6 component exactly like an end product in terms of the
7 surveillance program that we have for that also. And I
8 think any certification organization with integrity wants
9 to insure the integrity of its mark and we police our mark
10 equally as aggressive.

11 THE CHAIRPERSON: Mr. Schaefer.

12 MR. SCHAEFER: Just, and with all due
13 respect, very seriously, but even the use of the term
14 "equalizers" and you're talking about a competitive
15 environment, I think this gets into territory that's
16 business relationships and business-related, so there's
17 some, I think, risk when you hear terms like that in this
18 type of discussion.

19 And, again, there is so much that goes
20 into a product certification well beyond the inspection of
21 the product or frequency of inspection; it's the training
22 of our staff, it's the steps we take if we find a
23 noncompliant product and escalating our oversight and all

1 types of things that it's just, in our opinion it's not
2 appropriate for this type of requirement to be placed in a
3 standard.

4 THE CHAIRPERSON: Mr. Stull, do you want to
5 comment on that briefly?

6 MR. STULL: I have to. I think there's been
7 a missing of the point here. The fact is that what we
8 specify in the committee language for the change in NFPA
9 2112 is that UL, or whoever it might be, can impose its own
10 criteria on the organization providing the data to any
11 extent that it wants. That's what the requirement says.
12 Please read it. Meeting the applicable requirements of the
13 product certification organization accepting the recognized
14 components. Its own program. It can dictate its entirety
15 of its program if it so chooses.

16 All we're trying to avoid is it just
17 can't say we don't like you so we're not going to take your
18 data. If it wants to say we have to do four audits, we
19 have to have our auditors crosschange it or whatever, they
20 can do that. In fact, it could say no on that basis alone,
21 that it's not identical or absolutely equivocal to being
22 the same. That's what the standard says. It's not saying
23 accept something of a lesser value.

1 And by the way, for the record, my
2 representation of TenCate was just solely on the basis of
3 the annual meeting proponents because they weren't able to.
4 So this is an issue that our company feels strongly about
5 because we've been involved in this issue of products for
6 personal protective equipment of first responders for the
7 last 30 years, and we put our efforts, and we want them to
8 have the best protective clothing equipment possible, and
9 we don't want games being played in the industry that
10 increase the costs, particularly in the fiscal environment
11 that are difficult for Fire Departments to meet now. Thank
12 you.

13 THE CHAIRPERSON: Any additional questions
14 from Council? Very good. Mr. Stull and Ms. Gleason, I'm
15 going to give just 5 minutes between the two of you for any
16 wrap-up or final remarks that you want to make,
17 Mr. Schaefer, I'll do the same for you and then we'll bring
18 the hearing to a close.

19 MS. GLEASON: Well, thank you for listening
20 to us today, and at a minimum, I hope you have an
21 appreciation for the project and the amount of work that's
22 gone into development of the standards as well as the
23 certification requirements, and, you know, I just want to

1 remind everyone that the requirements really were brought
2 about by fire service representatives.

3 The union in particular wanted these
4 standards because of the fact that there were quality
5 problems in the industry, and so, I think we've come a long
6 way, and I know there are arguments about including
7 conformity assessment requirements in the standard, but in
8 this case I think it's completely appropriate.

9 And, again, we stand behind our
10 certification mark and other organizations do as well, and
11 based on the language that's proposed, I believe we could
12 determine that we would not want to use a certification
13 organization's test data for a variety of reasons, and so I
14 would compel you to allow that language to stay in as the
15 committee voted.

16 THE CHAIRPERSON: Mr. Stull.

17 MR. STULL: Yes, I'd like to add, please read
18 the language that the committee has proposed and was
19 comfortable with. It is a language that does empower the
20 certification organization. There's been a lot of rhetoric
21 about control, lack of control, liability. I've been
22 involved in over 250 product liability suits, and I can
23 tell you that any issue of increased liability on the

1 product certification organization is for naught. It
2 really is not going to be the case. With the way that most
3 of these suits work is not going to be a circumstance of
4 this level of scrutiny.

5 I'd also like to point out that
6 unfortunately there was a remark made at the annual meeting
7 by an individual representing the International Association
8 of Firefighters. I talked to Mr. Rich Duffy. He sent a
9 letter to Mrs. Cronin today that says that the
10 International Association of Firefighters is in support of
11 this for its members because it does not want its members
12 to be overburdened by costs based on what it thinks are
13 fair and equitable standards, and those standards have,
14 again, not in any way taken away from the certification
15 organization's ability to be high demanding and high
16 specific and to maintain the standards in which their
17 reputation is built.

18 THE CHAIRPERSON: Thank you. Mr. Schaefer.

19 MR. SCHAEFER: I'll basically reiterate what
20 I said in my opening statement. UL views these
21 requirements as commercial requirements and mandating how
22 competitors must interact. Even the concept of being able
23 to go to your competitor and dictate how they certify

1 components is inappropriate. You know, just as any of our
2 competitors -- and they have the option to do this -- any
3 of our competitors that might accept a UL recognized
4 component, we would not expect them to be able to come into
5 our organization and dictate how we certify components.
6 Again, it's just not an appropriate way to behave in a
7 competitive environment.

8 There is competition in this field.
9 Manufacturers do have choices as far as who they go to to
10 certify the component, who they go to to certify the end
11 product, and if anything, putting requirements in a
12 standard such as this could damage a competitive
13 environment which ultimately works to everyone's benefit.
14 I appreciate the time to speak today.

15 THE CHAIRPERSON: Thank you. With that I'm
16 going to bring this hearing to a close. I want to thank
17 all of you first for being here and taking the time to be
18 here today and help share this information to the Council,
19 and also for your participation in the NFPA codes and
20 standards process. The decision of the Standards Council
21 will be issued as a written decision by Ms. Cronin, the
22 secretary of the Standards Council. No member of the
23 Council nor member of NFPA staff is permitted to convey any

1 information regarding the council's decision. Only that
2 written communication will be the notification of
3 ultimately the council's decision.

4 So thank you again for your participation
5 today, and with that I'm going to move directly into the
6 next hearing item which is Agenda Item 11-8-8A. This is an
7 issue on NFPA 204 and certified amending motion 204-1.

8 (Off the record.)

9 THE CHAIRPERSON: All right, I'm going to
10 bring this hearing to order again. This is Agenda Item
11 11-8-8A. Just in looking around, is there anybody that has
12 come into the room since we did the last hearing that has
13 not introduced yourself for the record? Please.

14 MS. CURTIS: Martha Curtis, NFPA staff.

15 MR. BIELEN: Richard Bielen, NFPA staff.

16 MR. SPOTIS: Joe Spotis, NFPA.

17 THE CHAIRPERSON: And Mr. Schulte, I
18 understand in this case you're the appellant. Is there
19 anyone else speaking in favor of this appeal?

20 MR. SCHULTE: Not that I'm aware of.

21 THE CHAIRPERSON: Is anyone speaking in
22 opposition to the appeal? Mr. Koffel. With that, also a
23 couple of statements from members of Council,

1 Mr. Harrington.

2 MR. HARRINGTON: J. C. Harrington, member of
3 the Council. For the record, I'm recusing myself on this
4 Agenda Item. I will not participate as a member of the
5 Standards Council in the hearing, deliberations or voting
6 on this matter.

7 THE CHAIRPERSON: Thank you. Mr. Milke.

8 MR. MILKE: I'm Jim Milke, member of the
9 Council. For the record, I'm recusing myself on this
10 Agenda Item and will not participate as a member of the
11 Standards Council in the hearing, deliberations or voting
12 on this matter.

13 THE CHAIRPERSON: Thank you. I think,
14 Mr. Schulte, you ran here a little earlier, but just to
15 sort of reiterate, I'm going to give you about 10 minutes
16 to make any opening remarks that you want to make regarding
17 the appeal to the Council. Mr. Koffel, I'll give you on
18 the other side any statements that you want to make; I'll
19 give you ten minutes as well. I'll open it up to questions
20 from the Council and give you each about 5 minutes to close
21 out and that's how we will close the hearing. So
22 Mr. Schulte, the floor is yours.

23 MR. SCHULTE: Thank you, Mr. Chairman. On

1 June 24th, I submitted a letter to the Standards Council
2 and I think it pretty well described my objections to the
3 publication of NFPA 204, and I've also submitted
4 attachments that I think pretty well describe what I have
5 in mind here. I'm going to go through that letter just
6 very briefly. I don't expect to be talking for 10 minutes,
7 but before I, before I do that I'd like to borrow a line
8 from Groucho Marx, "Before I speak I've got something
9 important to say."

10 And so what I'd like to do is take a look
11 at Mr. Tucker's response to the appeal, and that's an
12 e-mail dated July 7th to Amy Cronin, and basically in that
13 e-mail Mr. Tucker defers to Mr. Davis, and Mr. Davis gives
14 a synopsis for the position of the NFPA 204 committee. The
15 reason I want to start with this is because of information
16 in this commentary that's incorrect.

17 Mr. Davis says that the most important
18 reason that NFPA 204 should be published because there's
19 draft curtains requirements in the International Building
20 Code and the International Fire Code for draft curtains,
21 and Mr. Davis feels that that's the reason we need to
22 publish this addition of NFPA 204.

23 I'd like to correct Mr. Davis's comment.

1 In the International Fire Code, the requirements for draft
2 curtains had been deleted, and so basically this kind of
3 nullifies or makes neutral Mr. Davis's comments. There are
4 still requirements for draft curtains in the International
5 Building Code. They only apply to storage buildings with
6 no high piled storage exceeding 50,000 square feet in area.
7 I believe that probably there are no buildings of that size
8 that don't contain high piled storage.

9 The other buildings that, where the
10 International Building Code requires draft curtains, would
11 be industrial buildings, no storage, then also exceeding
12 50,000 square feet, and of course, there might be some
13 buildings today, but given the recession, I think those are
14 going to be pretty far and few between. So what I want to
15 do first is to say what Mr. Davis has provided in the
16 e-mail dated July 7th is incorrect.

17 Now, once we got that off the table, I'd
18 like to go back to my letter dated June 24th. I've given
19 four reasons why I think that NFPA 204 should not be
20 published, the 2012 edition, and we should defer this for
21 at least a year. The very first reason is a conflict
22 between NFPA 13 and NFPA 204. I think the conflicts are
23 very obvious. I'm going to go through those in just a

1 moment.

2 Sprinkler design criteria. NFPA 204 in
3 the appendix -- appendix, excuse me -- annex F.3 contain
4 sprinkler design criteria. I think that's the wrong
5 standard. Sprinkler design criteria should be in NFPA 13
6 not in NFPA 204. I think that the NFPA 13 committee should
7 be determining sprinkler design criteria not the NFPA 204
8 committee.

9 The third reason I've given here why I
10 think that NFPA 204 shouldn't be published deals with
11 firefighter safety. We've got two relatively new, I'm
12 going to refer to them as standards, they're called NIOSH
13 alerts on firefighter safety. Nowhere in NFPA 204, the
14 proposed new NFPA 204 do we address the information
15 provided in those two NIOSH alerts, and I think it's very
16 critical to stay up to date that NFPA 204 address what's in
17 the NIOSH alerts.

18 Lastly, the last reason that I'd like to
19 present as far as not having the new edition of NFPA 204
20 published deals with an engineering analysis. The proposed
21 edition of NFPA 204 requires that an engineering analysis
22 be done to document that we can use sprinklers and roof
23 vents together. There is no accepted engineering analysis

1 that can be used to provide that documentation. So, in
2 effect, what we have here is NFPA 204 telling us we need to
3 do an engineering analysis, and that engineering analysis
4 can't be done.

5 Let me go back to Item No. 1 and then
6 I'll move on here to some of the other items. The conflict
7 between NFPA 13 and NFPA 204. In a document I titled The
8 Critique of Annex F.3, I believe the Standards Council has
9 that, on page 7 of that document, this is a statement from
10 Annex F.3. NFPA 204 suggests that we use gang vents in
11 sprinkler buildings. Typically the roof vent that you're
12 familiar with is individually activated. A fusible link
13 operates, the vent opens. With a gang venting, multiple
14 vents open at the same time, and those vents might be
15 operated from sprinkler system water flow, it might be
16 operated from smoke detectors, or it might be activated by
17 a manual switch; in other words, we're going to have
18 multiple vents open at the same time.

19 Now, on page 8 of this document on Annex
20 F.3, again, in Annex F.3, let me quote this. It says "The
21 studies of smoke and heat venting used in conjunction with
22 controlled mode sprinklers do not provide evidence that
23 venting has a negative effect on control mode sprinkler

1 performance." That's exactly the opposite of what NFPA 13
2 is telling us. So it's completely opposite of what's in
3 NFPA 13 right now. And so there's a conflict that needs to
4 be resolved that hasn't been resolved.

5 We have roof vent provisions in NFPA 13
6 now, and the substantiation for those vent provisions in
7 NFPA 13 say "The intent of the standard is that roof vents
8 and draft curtains should not be used in conjunction with
9 storage protection." I think that statement is pretty
10 obvious as to what that means. So here we have NFPA 204
11 saying there's no problem, here we have NFPA 13 saying I
12 think we've got a problem, and we do have a problem because
13 we've got standards going in opposite directions.

14 On page 9 of the document I just referred
15 to, again we have a statement in NFPA 204 that says
16 "There's no detrimental effects to the opening of vents."
17 Again, in complete opposite of NFPA 13. So those are the
18 conflicts between NFPA 13 and NFPA 204.

19 To get back to the other items that I've
20 noted here in my letter to the Standards Council, Item 2,
21 sprinkler system design criteria, I think that's obvious
22 what that's about. NIOSH standards firefighter safety, the
23 NIOSH alerts, I've already discussed that. The engineering

1 analysis, the proposed, well, the present edition of NFPA
2 204, excuse me, the 2007 edition of NFPA 204 requires a
3 performance based analysis. In the proposed NFPA 204, that
4 wording has been changed to an engineering analysis. So
5 they've changed some wording. The question is is it
6 actually possible to do that engineering analysis?

7 The attachment list here that I've
8 attached to the letter addresses this issue. It's titled
9 Engineering Analysis Commentary. Mr. Dillon of Dillon
10 Consulting Engineers submitted a comment back in December
11 of 2009 on NFPA 204. Mr. Dillon's comment says "The
12 document prematurely and improperly requires and relies
13 upon unproven methods of calculation for the effectiveness
14 of smoke and heat vents in the presence of automatic
15 water-based sprinkler protection systems. It also relies
16 on calculations of questionable accuracy to determine
17 activation times for the vents and the sprinklers."

18 Mr. Dillon is correct. As part of the
19 attachments --

20 THE CHAIRPERSON: Mr. Schulte, you have about
21 1 minute left.

22 MR. SCHULTE: Okay, thank you. As part of
23 the attachments, I've submitted a report by Hughes

1 Associates, a lengthy report. The client for Hughes
2 Associates says that the report by Hughes Associates is
3 worthless. If Hughes Associates can't produce an
4 engineering analysis that shows what's going to happen when
5 we have sprinklers and vents in the same building, then I
6 would suggest that probably can't be done and that
7 Mr. Dillon is correct. I think I'm going to just leave it
8 at that. Thank you.

9 THE CHAIRPERSON: Thank you. Mr. Koffel.

10 MR. KOFFEL: Thank you, William Koffel,
11 Koffel Associates, and on this item we are representing the
12 AAMA Smoke Vent Task Group, and the AAMA Smoke Vent Task
13 Group consists of manufacturers of smoke vents, so
14 obviously we have a vested interest in this item.

15 We would encourage the Council to support
16 the consensus process and the outcome of the committee
17 process. As you know, this document was returned to
18 committee during the last cycle. We received several
19 comments with regard to this issue. This was the issue,
20 the reason the document was returned to cycle last time or
21 returned to committee last time. We received comments from
22 Mr. Schulte. We received comments from two other people
23 who had spoken on this issue in the past, Carl Baldassarre

1 and Dan O'Connor.

2 Looking at the record, the committee
3 looked at the two comments that proposed modifications to
4 the document, worked with those, Mr. Baldassarre was
5 present at the meeting, and I'm not trying to say that
6 Mr. Baldassarre supported or did not support the final
7 action of the committee, but he was present at the meeting,
8 was able to work with us to develop what the committee
9 eventually balloted as a consensus document for the
10 proposed Chapter 11.

11 Is the document perfect? No. Would we
12 like to know even more about sprinkler interaction with
13 roof vents? Yes. Does the committee think that the
14 document offers to the users of the document the best
15 available information at this point in time? I think we
16 do.

17 Some of the comments you've heard with
18 regard to a conflict between NFPA 13 and NFPA 204, I know
19 Mr. Schulte has been having discussions with NFPA staff
20 about that conflict. I'm not sure that there is any
21 consensus, opinion or view from staff at this point in time
22 that there necessarily is a conflict between NFPA 13 and
23 NFPA 204.

1 With regard to design criteria being in
2 NFPA 204, yes, I think ultimately if we have definite
3 design criteria for the sprinkler system, that belongs in
4 NFPA 13. However, what 204 basically addresses is the
5 criteria for the smoke vent if they're used in conjunction
6 with the sprinkler system in a building, and I don't think
7 NFPA 204 does establish design criteria for the sprinkler
8 system, and, in fact, in the language adopted by the
9 committee, we've actually referred to NFPA 13, and one of
10 the reasons there is a reference to NFPA 13 in the
11 committee action is to insure that the requirements in NFPA
12 13 are in fact met. So we recognize that we need to make
13 sure that the designers use both documents.

14 With regard to the engineering analysis,
15 the statement that the committee has put in the document is
16 that there's no, and I don't have this exactly, but there's
17 no universally accepted engineering analysis that could be
18 put into an NFPA guide or standard at this point in time
19 that could apply to all applications. I don't think the
20 committee is saying that it can't be done. I believe the
21 work that Mr. Schulte is referencing with regard to the
22 work performed by Hughes Associates was part of a research
23 effort to do modeling to try to develop some language that

1 could be incorporated into NFPA 204.

2 I also believe that the language that he
3 is referring to, at least in my discussions with the
4 client, does not necessarily represent the universal or
5 consensus opinion but rather this was taken from minutes of
6 a meeting in which there was concern that if the Hughes
7 Associates' work was not able to move forward that maybe
8 they didn't receive the value of that research project that
9 they were hoping to receive from that effort, at least
10 that's the way it has been portrayed to me in my
11 discussions with the client.

12 So I would encourage the Council to
13 support your committee and to release the document,
14 recognize that the committee will continue to work on this
15 area and hopefully be able to refine it as more information
16 and research is available. Thank you.

17 THE CHAIRPERSON: Thank you. I'll open it up
18 to questions from members of the Council. Mr. Clary.

19 MR. CLARY: Yes, Shane Clary, member of
20 Council to Mr. Schulte. As part of the package that was
21 sent to us, there's a very lengthy set of minutes from the
22 AAMA 72nd Annual Conference in Coronado, California. What
23 was the, I guess what point is being made within these

1 minutes?

2 MR. SCHULTE: I think I'm going to refer to
3 page 128 of those minutes. That's the portion that
4 addresses smoke and heat vents, and you'll see in those,
5 and the teleconference discusses the Hughes Associates
6 report that was just discussed or just mentioned here, and
7 there you will see the Smoke Vent Task Group's statement
8 that the Hughes Associates report is worthless. And so
9 that was the sole purpose of submitting that.

10 There's about two or three pages in the
11 whole 100 pages that's of interest. The reason I submitted
12 the whole thing was because it was just a single document,
13 a single PDF, and my technical capabilities as far as
14 computers go, I don't know how to get that out of it, so it
15 was easier for me to send you the whole thing, let you know
16 the whole thing exists.

17 MR. CLARY: Okay, thank you.

18 THE CHAIRPERSON: Additional questions? Jim
19 Pauley, chair of the Council. I guess, Mr. Schulte, I'm
20 just curious, there's a number of the things you said and
21 you've got a number of elements in your submittal to
22 technical points that are in the document and that you've
23 rebutted. Have you been interacting with the 204 committee

1 or submitting proposals and comments and making those
2 points as well.

3 MR. SCHULTE: I've submitted either one or
4 two comments. Just recently I submitted a comment, just
5 recently within the last 18 months, a comment to completely
6 delete Chapter 18, excuse me, Chapter 11 and in NFPA 204.
7 Chapter 11 is the chapter that deals with sprinklers and
8 roof vents. Just delete the whole thing and I provided a
9 lengthy explanation why, and the explanation is basically
10 it conflicts with NFPA 13.

11 THE CHAIRPERSON: Thank you. Ms Brodoff.

12 MS. BRODOFF: Maureen Brodoff. Maybe you
13 already said this but I just want to clarify. Do you
14 represent any client interest in this matter?

15 MR. SCHULTE: None.

16 THE CHAIRPERSON: Mr. Demers.

17 MR. DEMERS: Dave Demers, Council member.

18 Mr. Schulte, what is your technical analysis, or what is
19 your professional opinion regarding smoke vents and the use
20 of them at all in sprinkler buildings and storage
21 occupancy; is it your position that we shouldn't even have
22 them?

23 MR. SCHULTE: That's correct, and it's been

1 that position since 1981.

2 MR. DEMERS: Based on your writings, that's
3 what I assume.

4 MR. SCHULTE: That's correct.

5 MR. DEMERS: It's consistent.

6 MR. SCHULTE: Right.

7 MR. DEMERS: Thank you.

8 THE CHAIRPERSON: Mr. Bell.

9 MR. BELL: Yes, a question for Mr. Schulte.
10 Your appeal is to return the entire report.

11 MR. SCHULTE: That's correct.

12 MR. BELL: Is there a possibility of carving
13 out your key concerns and submitting that as a TIA at some
14 point?

15 MR. SCHULTE: To tell you the truth, I'm not
16 all that familiar with the NFPA process and how a TIA would
17 interact within NFPA 204. I'm not up on that, and so I
18 really can't answer your question.

19 THE CHAIRPERSON: Additional questions?
20 Mr. Schulte, I'll give you five minutes to wrap up or add
21 anything that you want, and Mr. Koffel, I'll do the same
22 for you.

23 MR. SCHULTE: Thank you. I'm just going to

1 be very brief. Since I filed this appeal, I've requested
2 far more interpretations of the NFPA 13 Committee on the
3 roof vent provisions in NFPA 13. I submitted basically two
4 formal interpretations. Each one is three questions. One
5 deals with whether gang roof vents are permitted by the
6 roof vent provisions in NFPA 13.

7 The other set is also three questions.
8 Basically they're all three similar, and that formal
9 interpretation request is whether we can use the design
10 criteria in NFPA 13 with gang roof vent systems, and I
11 believe the answer to both of those questions is obvious
12 based upon the substantiation, the NFPA 13 roof vent
13 provisions, but so far no answer. I was told that the NFPA
14 13 Committee is waiting on the Standards Council. It's the
15 chicken and egg thing, so we'll see. Other than that, I
16 don't think I have anything to add. Thank you.

17 THE CHAIRPERSON: Thank you. Mr. Koffel.

18 MR. KOFFEL: I don't think I have anything
19 further to add. Thank you.

20 THE CHAIRPERSON: Thank you, gentlemen.
21 Thank you both for being here today and for sharing
22 information with the Council. We appreciate that, and
23 thank you both for your participation in the NFPA codes and

1 standards process. The Council will make a decision on
2 this and that decision will be issued in written
3 communication by Ms. Cronin, the secretary of the Council.
4 No member of staff or member of the Council is permitted to
5 convey any information regarding that decision. That
6 written communication will be the sole way that Council
7 will communicate on this topic. So again, thank you for
8 being here today.

9 With that, we will bring that hearing to
10 a close, and this is probably an appropriate time, I have
11 three hearings left, so this is an appropriate time to take
12 a break. We are going to take about a 10-minute break for
13 the Council, and then we'll start back in with the final
14 three hearings, so we'll go off the record at this moment.

15 (Recess taken.)

16 THE CHAIRPERSON: We'll come back to order
17 and we'll go back on the record. We have three hearings
18 left this afternoon. The next item we're going to go into
19 is 11-8-19D. We have sort of rotated the room again, and
20 so since I went off the record, I am going to go around the
21 room and have folks introduce themselves so we capture it
22 on the record. My name is Jim Pauley, chairman of the
23 Council.

1 MS. CRONIN: Amy Cronin, NFPA staff and
2 Standards Council secretary.

3 MS. FULLER: Linda Fuller, NFPA staff.

4 MR. HARRINGTON: J. C. Harrington, member of
5 Council.

6 MR. MILKE: Jim Milke, member of Council.

7 MR. LEBER: Fred Leber, member of Council.

8 MR. DEMERS: David Demers, member of the
9 Council.

10 MR. JARDIN: Joseph Jardin, member of
11 Council.

12 MR. HUGGINS: Roland Huggins, member of
13 Council.

14 MR. McDANIEL: Danny McDaniel, member of
15 Council.

16 MR. SNYDER: Michael Snyder, member of
17 Council.

18 MR. OWEN: Richard Owen, member of the
19 Council.

20 MR. CLARY: Shane Clary, Council member.

21 MR. BELL: Kerry Bell, member of Council, and

22 I would like to note for the record that I'm a member of
23 the technical committee on the residential sprinkler

1 systems. As a member of this committee, I participate in
2 the consideration of voting on the issues that appear to be
3 related to this appeal. I have reviewed the obligations
4 under the guide for conduct and participants of the NFPA
5 process to consider whether there was any reason for me to
6 recuse myself from consideration of this appeal. I have
7 concluded that I do not have any views that are or would
8 appear to be fixed concerning the issues, and I am fully
9 able to give open and fair consideration to this appeal.
10 For the record, therefore, I have considered the matter and
11 believe that I can fully, fairly and impartially fulfill my
12 role as Council member on this appeal.

13 MS. BRODOFF: I'm Maureen Brodoff, NFPA staff
14 and legal counsel to the Standards Council.

15 MR. FINNEGAN: Dan Finnegan, Siemens
16 Industry, guest.

17 MS. HOUSEWRIGHT: Meghan Housewright, NFPA
18 staff.

19 MS. COLLETTE: Kristin Collette, NFPA staff.

20 MR. COLONNA: Guy Colonna, NFPA staff.

21 MR. SPOKIS: Joe Spokis, NFPA.

22 MS. STANEK: Sandra Stanek, NFPA staff.

23 MR. HART: John Hart, NFPA staff.

1 MS. GOLINVEAUX: Tracy Golinveaux, NFPA

2 staff.

3 MR. KLAUS: Matt Klaus, NFPA staff.

4 MR. DUFFY: Chad Duffy, NFPA staff.

5 MR. DUVAL: Derek Duval, NFPA staff.

6 MR. BIELEN: Richard Bielen, NFPA staff.

7 MR. KOFFEL: Bill Koffel, Koffel Associates.

8 MS. CARROLL: Elena Carroll, NFPA staff.

9 MS. GOYETTE: Joanne Goyette, NFPA staff.

10 MS. CURTIS: Martha Curtis, NFPA staff.

11 MR. GOLINVEAUX: And James Golinveaux with

12 Tyco Fire Suppression & Building Products.

13 THE CHAIRPERSON: Thank you. The particular

14 Agenda Item that we have, again, 11-8-19D, this has to do

15 with NFPA 13D and an appeal to issue TIA 1028R.

16 Mr. Golinveaux, you're speaking in favor of the appeal. Is

17 anyone else speaking in favor of the appeal? Is anyone

18 speaking in opposition to the appeal?

19 Mr. Golinveaux, I'm going to give you ten

20 minutes to introduce this to the Council, make your opening

21 remarks, there will be questions from the Council and any

22 wrap-up comments, and then we'll close out the hearing.

23 MR. GOLINVEAUX: To start off with full

1 disclosure, this proposal was made, supported by a Research
2 Foundation report. I am a member of the Board of Trustees
3 for the Research Foundation just to put that on the record,
4 and I'm also the proud father of a member of staff, Miss
5 Tracy Golinveaux, just to put that on the record as well.
6 That's what I'm most nervous about is speaking in front of
7 her.

8 To simplify this appeal, the Research
9 Foundation undertook a program to help mitigate the cost of
10 the installation of residential sprinklers. Residential
11 sprinklers are currently listed by Underwriters Laboratory
12 or Factory Mutual. Most of the design or the listing
13 limitations are for smooth, flat, horizontal ceilings, and
14 we use a two-sprinkler design for these single-family homes
15 for NFPA 13D.

16 When we come to the slope ceiling
17 configurations or alternate configurations that have beams,
18 we default to special listings or other guidance by 13D.
19 This other guidance increases the cost of the installation
20 of residential sprinklers by larger pipe sizes, higher
21 flows, more sprinklers in the design area and larger
22 meters. All of these combined increase the cost of the
23 installation of residential sprinklers in single-family

1 homes.

2 So the proposal that I made was to the
3 next cycle of 13D, but in the meantime, we submitted this
4 as a tentative interim amendment to the 2010 edition of
5 NFPA 13D, that of which I'm here today to speak to you on
6 behalf.

7 So the proposal is TIA 1028R for 13D.
8 The reason for the appeal is the failing ballot of the
9 Technical Committee on emergency nature. To summarize the
10 vote, the Technical Correlating Committee passed the motion
11 on correlation and emergency nature, but the Technical
12 Committee passed 100 percent on the technical merit but
13 failed by a round-off of .25 votes or one vote of the
14 emergency nature. So I was one vote short of receiving
15 both a pass on technical and emergency nature, so the
16 reason for the appeal.

17 The appeal that I am basing this on today
18 is in accordance with NFPA regulation Section 5.3E and a
19 reference to 5.3F; specifically, that the method is not in
20 current use or unavailable to the public. To summarize the
21 intent of this TIA is to provide long-awaited guidance to
22 the HJ and installing contractors on how to handle slope
23 ceiling conditions relative to the number of design

1 sprinklers in one and two-family homes and manufactured
2 homes. The current 2010 13D standard recognizes the
3 existence of sloped ceilings, yet remains silent as to the
4 design standard.

5 Section 8.1.2 requires two sprinklers to
6 be designed but restricts that to flat, smooth, horizontal
7 ceilings. With an annex note, stating that some
8 residential sprinklers have been listed under smooth
9 sloped, and where ceilings have configurations outside
10 scope of current listings, special sprinkler design
11 features such as larger flows and/or three or more
12 sprinklers in the design area, this mandates higher cost
13 for the installed by lack of guidance in the standard for
14 how to handle these slope ceiling conditions or these beam
15 slope ceiling conditions.

16 The great research of the Fire Protection
17 Research Foundation titled Analysis and Performance of
18 Residential Sprinkler Systems with Sloped and Sloped and
19 Beam Ceilings was unfortunately unavailable during the
20 revision cycle of the 2010 NFPA 13D. This report, which is
21 the basis of the technical proposal that received
22 100 percent support of the Technical Committee, shows that
23 the current sprinkler listings and/or the increased number

1 of design sprinklers and flow requirements is not and was
2 not necessary.

3 The fundamental conclusion of the
4 foundation report for not requiring additional flow or
5 number of sprinklers, increase of number of sprinklers is
6 the effect of higher pressures available to the first
7 sprinkler operation, providing a higher level of control
8 and a thorough review of the room tenability.
9 Unfortunately, in the 2010 cycle of 13D, the annex section,
10 which recommends the higher flows and greater number of
11 sprinklers, was revised to add cautionary language on
12 recent attempts to reduce the two sprinkler demand to a
13 single sprinkler.

14 The data for looking into a single
15 sprinkler demand was based on field performance of one
16 sprinkler successes, yet the annex statement quote the
17 impact of hydraulic increase in the number of single
18 sprinkler activations cannot be determined. And this
19 causes confusion to the HJ to accept the Fire Protection
20 Research Foundation's report as an equivalent method
21 because we have guidance in the appendix saying hydraulic
22 increase cannot be determined to the effect of that, but
23 the whole foundation of the report is that the hydraulic

1 increase of a two-sprinkler demand does have an effect and
2 does provide the minimum level of life safety.

3 So I have some conflict in the appendix
4 guidance to the equivalent method of what most of the
5 people who say this is not an emergency nature, it makes it
6 difficult for the authority to accept the Fire Protection
7 Research Foundation report. But the committee, as stated
8 with the language that was submitted, there's a hundred
9 percent technical support for this.

10 The statement in the 2010 13 standard
11 does not support the research done by the foundation. The
12 hydraulic increase of the first sprinkler does have an
13 impact, a positive impact on the performance of residential
14 sprinklers, provide life safety in 13D occupancies. The
15 committee statement is correct for the single sprinkler
16 argument because there's confusion in accepting the
17 report's conclusions.

18 Also, note that sloped beamed ceilings
19 are currently outside the scope of all current listings and
20 not included in the design standard of NFPA 13D. So it
21 completely defaults to the authority having jurisdiction to
22 decide how to protect those buildings, and beam-sloped
23 ceilings are becoming more common in the average home,

1 especially new construction.

2 NFPA has an initiative to promote the
3 adoption of the installation of residential sprinklers in
4 single-family homes to reduce the overall deaths by fire.
5 The 2012 International Residential Code requiring these
6 sprinklers will reference the 2010 edition of NFPA 13D. We
7 need this revision now.

8 The work of the foundation provides
9 design guidance and eliminated increased cost due to higher
10 water demands. The proposed technical change that received
11 a hundred percent technical support corrects the confusion
12 caused by the 2010 annex. Additionally, the proposed
13 change provides design guidance currently not available in
14 the standard. Arguments that equivalent methods should be
15 used are not justifiable in a standard that's supposed to
16 be simple and easy to understand and use. This is the
17 simplest design standard out there, NFPA 13D. These
18 systems are supposed to cost between \$1.00 and \$1.61 a
19 square foot. To require equivalent method as a submittal
20 for protection requires more work than what the standard is
21 supposed to bring to the table.

22 My proposal lost ballot on emergency
23 nature on the Technical Committee by only one vote but did

1 pass the Technical Correlating Committee on emergency
2 nature. I believe the arguments that I provided justify
3 the emergency nature prescribed in the regulation, Section
4 503E and F. I ask the Council to support my appeal and
5 issue TIA 1028R. Thank you very much.

6 THE CHAIRPERSON: Thank you. I'll open it up
7 to questions from members of the Council. Mr. Clary.

8 MR. CLARY: Shane Clary, member of Council.
9 Did you submit this TIA on behalf of the foundation or on
10 behalf of Tyco Fire Protection Products?

11 MR. GOLINVEAUX: I submitted it on behalf of
12 Tyco Fire Protection Products. I had called Kathleen
13 Armand and asked if it was appropriate to submit the same
14 language that I submitted to the ROP process as a TIA, and
15 she gave me her nod of approval that I could at least
16 submit it to the TIA, but I did call her in advance before
17 I submitted, but I did submit it on behalf of Tyco Fire
18 Protection Products just because that's who I work for.

19 THE CHAIRPERSON: Okay, thank you. Mr.
20 Huggins.

21 MR. HUGGINS: Roland Huggins, Council member.
22 I noticed in your letter here on your appeal you identified
23 some E and F and your reasoning for emergency nature, but

1 was it not in the initial ballot, the justification was
2 just predicated upon cost?

3 MR. GOLINVEAUX: It was probably heavily on
4 cost as to the reason. I didn't realize that as many
5 people felt as strong of the emergency nature as they did,
6 so I had to reevaluate when I saw that I had lost emergency
7 nature as to the proposal and the effect.

8 MR. HUGGINS: So more to the point, the
9 initial ballot did not identify these other two items.

10 MR. GOLINVEAUX: No, it did not. It was more
11 on the cost initiative and saving cost to reduce the
12 install cost, yes.

13 THE CHAIRPERSON: Mr. Demers.

14 MR. DEMERS: Mr. Chairman, Dave Demers,
15 member of the Council. Two questions. How many negative
16 votes were there, and a follow-up to that, I would have
17 liked to have seen what those negative comments were. I
18 don't need it now, but if you could kind of give more of a
19 summary, I think you already have explained it a little
20 bit, but why they voted negatively.

21 MR. GOLINVEAUX: I believe the ballot count
22 was 27 voting, 7, yes, 7 disagreed. So I needed 20.25
23 votes for a positive vote and I received 20. The general

1 sense was they just, if I read through them, that I did not
2 satisfy the intent of emergency nature. If I had to
3 summarize the 7 comments that came in, they just didn't
4 feel that I proved emergency nature with my proposal.

5 THE CHAIRPERSON: Mr. Demers.

6 MR. DEMERS: A follow-up, so they didn't make
7 any explicit statements disagreeing that it was not of,
8 that it was not of an emergency nature -- I don't want to
9 put a double negative in there -- but they weren't
10 contesting that it wasn't emergency; they just didn't have
11 enough information to confirm that?

12 MR. GOLINVEAUX: I'll give them more credit
13 than that because there were a couple of comments that said
14 as long as we have the equivalent method in the standard
15 that any new technology can be applied through the
16 equivalent method.

17 As I read through those comments, that
18 helped me justify my proposal to you where I looked at the
19 appendix and why the authority having jurisdiction that
20 would accept that equivalent method may not accept the
21 foundation report the way the committee does.

22 So, but generally, I didn't provide it,
23 but the best comments I saw from members in their negative

1 ballots was that the equivalent method was out there and
2 this could be used, just to support their argument. And I
3 believe Michael Friedman submitted a letter to Council as
4 well and kind of followed the same format that the
5 equivalent method was available to people out there. I
6 just think that this is just the wrong standard to have to
7 apply that report.

8 MR. DEMERS: Thank you.

9 THE CHAIRPERSON: Mr. Huggins.

10 MR. HUGGINS: Roland Huggins, Council member.

11 Speaking of Mark Ready, he commented on his paperwork that
12 he felt this would create a conflict between D, R and 13.
13 Would you have any opinion on that?

14 MR. GOLINVEAUX: Absolutely. It does not
15 create a conflict between 13D, 13R or 13. 13R and 13
16 require a four-head sprinkler calc. 13D requires a
17 two-head calc, a two sprinkler calc, and this report is on
18 the issue of the two sprinklers and the listing that slope
19 ceilings doesn't require additional flows for the two
20 sprinkler demand. So that's why I focused on 13D. That's
21 where the greatest impact is.

22 MR. HUGGINS: A follow-up.

23 THE CHAIRPERSON: Mr. Huggins.

1 MR. HUGGINS: Roland Huggins, Council member.

2 And speaking of potential conflicts, although we can infer
3 from the numbers supporting it on the technical merit, do
4 you perceive any potential for a conflict to, it not be
5 approved in 2013, if it was put in 2010; I mean is there
6 any push-back from any sector that might create a
7 difference?

8 MR. GOLINVEAUX: I'm not aware of any, and my
9 staff leader is here. I have not heard of any push-back
10 for the 2013 edition. It's foundation work. It's good
11 work. That was a biased comment.

12 THE CHAIRPERSON: Ms. Brodoff.

13 MS. BRODOFF: Maureen Brodoff. I don't have
14 in front of me or it's not yet in the record, but you
15 submitted a proposal to the next edition 13D?

16 MR. GOLINVEAUX: Yes, that's in the ROP
17 process currently.

18 MS. BRODOFF: So has there been an ROP
19 meeting yet?

20 MR. GOLINVEAUX: Yes.

21 MS. BRODOFF: And what was the result?

22 MR. GOLINVEAUX: It's moved to ROC, so the
23 language that was proposed has been balloted and approved

1 and is moved to ROC.

2 MS. BRODOFF: Is it the exact same language?

3 MR. GOLINVEAUX: Yes, it is. That's the R
4 version. The first version I submitted I made an error and
5 we revised it to be what was submitted in the 2013 ROP.

6 THE CHAIRPERSON: Ms. Cronin.

7 MS. CRONIN: Amy Cronin. I think I heard
8 somebody at the end of the table ask do you anticipate a
9 change at the ROC at all?

10 MR. GOLINVEAUX: I do not and I haven't seen
11 any opposition to the proposal, and I was looking for Matt
12 to clarify because I have not seen the ROC comments yet,
13 but I don't foresee any changes, especially to the intent
14 of using the flat ceiling design listings for slope ceiling
15 applications.

16 THE CHAIRPERSON: Jim Pauley, chair of the
17 Council. Just to put it on the record, do you know what
18 the vote was at the ROP meeting, was it unanimous as well
19 as the Technical Committee?

20 MR. GOLINVEAUX: I don't know. I apologize.

21 THE CHAIRPERSON: No, that's fine, that's
22 fine. Any other questions from members of the Council?
23 With that, Mr. Golinveaux, any closing comments?

1 MR. GOLINVEAUX: No. I enjoy the process and
2 I support the foundation; I support the work. And in this
3 one I just believe it's the right thing to do.

4 THE CHAIRPERSON: Great, thank you. Thank
5 you for your time in being here today and presenting the
6 information to Council and also thank you for your
7 participation in the process. We do appreciate it.

8 The decision of the Council will be
9 issued by written decision by Ms. Cronin, the secretary of
10 the Council. No member of staff nor member of the
11 Standards Council is permitted to convey any of that
12 information outside of that written decision that will be
13 issued.

14 So with that, I'll bring this hearing to
15 a close. And we have two hearings left both with the same
16 appellant and so I'm just going to go off the record for a
17 couple of minutes while we switch appellants. I'm not
18 going to take a full break at this point, but we can go off
19 the record and then I'll come back on.

20 (Off the record.)

21 THE CHAIRPERSON: We will go back on the
22 record, and I'm just going to ask that anybody that was not
23 in the room for the previous hearing if you would just

1 introduce yourself, your name and your affiliation for the
2 record please.

3 MR. FRANCIS: Sam Francis, American Wood
4 Council.

5 MR. MATTOS: Art Mattos, XL GAPS, chair of
6 the 664 Committee.

7 MR. URAL: I'm Erden Ural, LPFTI.

8 THE CHAIRPERSON: Anybody else? Okay. This
9 particular hearing is agenda items 11-8-10A and 11-8-10B.
10 This deals with NFPA 664 in two different certified mini
11 motions, certified mini motions 664-2 and 664-3. We
12 combined these into one hearing because both of these deal
13 with a terminology issue, albeit separate terminology in
14 the two CAMS but terminology overall.

15 I'm going to operate the hearing that,
16 Mr. Ural, you're the appellant, so I'm going to give you 10
17 minutes to essentially cover both of those items for the
18 Council. We certainly have all of the written
19 documentation that Council has looked at and reviewed that.
20 So anything that you want to add to that record, or if
21 there is anything you want to highlight to the Council in
22 that 10 minutes will be available to you.

23 Gentlemen, since you're speaking on

1 behalf of the committee and in opposition to the appeal,
2 I'm going to give you 10 minutes between the two of you for
3 any opening remarks that you want to make in response to
4 that. I'll then open it up for questions from members of
5 the Standards Council. When we're finished with that, I'll
6 give each of you five minutes to essentially close that
7 back out and that's how we'll close the hearing.

8 So, Mr. Ural, you have the floor first.

9 MR. URAL: Good afternoon. First of all, as
10 a background, I have studied combustion in undergraduate
11 school, I got a Ph.D., in aerospace engineering. My first
12 job was at Factory Mutual. I worked there for 16 years as
13 a research scientist on dust and gas explosion, and after
14 that I ran the explosion test site at Kidde Fenwal in
15 Holliston, Massachusetts, and I did a lot of dust testing,
16 so that's my involvement with dust, and right now I'm an
17 independent consultant. I still work with dust and gas
18 explosions.

19 I serve -- you guys have appointed me to
20 essentially all the dust committees, and I serve on the, I
21 am an active member on all the dust committees, and I try
22 to identify the differences and unify it.

23 There is alarming difference in this NFPA

1 664 and the combustible dust definition, and I felt it's
2 really important for NFPA because it also incurs tort
3 liability for NFPA in my view and in the view of the
4 attorneys that I have spoken with. So that's why among all
5 my appeals the CAM 664-2 is the most serious and
6 potentially most dire consequences for NFPA.

7 So I am a member of the 664 Committee and
8 I brought it to the attention of the NFPA 664 Committee,
9 and at the ROP the committee understood the issues and have
10 accepted a definition similar to other NFPA standards, and
11 that you see in the page 1866 of your folder. There's a
12 table that shows the ROP text versus ROC text. So what I'm
13 trying to do here is to return the document to the version
14 that's in the ROP text.

15 During the ROC some changes were made to
16 it and the committee has included both the old definition
17 and the new definition and then they came up with some
18 contradictory definitions. Why is this definition
19 important? It is very important because it tells the
20 people if your dust does not fit this definition that means
21 the standard doesn't apply. That means you don't have a
22 dust explosion hazard, but in reality it does.

23 And one standard says if you use NFPA 664

1 it would call, you would do a test and then decide whether
2 the dust is explosible or not. If you use 664, you would
3 look at the particle size, and what is the most dangerous
4 part of that is it doesn't say if your particles are larger
5 than this your dust is explosive. It says if 50 percent of
6 your mass is larger than this magic particle size your dust
7 is not explosible. It's silent on the remaining 50 percent
8 that's smaller.

9 And Factory Mutual has run some tests and
10 determined that this is not true on a general basis, and
11 more recently we have, we are preparing our paper for
12 publication in the AIChE Loss Prevention Symposium and we
13 have run some tests, and I shared a one-page report, I
14 shared that with the committee as well as with you. This
15 is a one-page summary of the test results that shows that,
16 if you look at the table in here, if your particles are
17 smaller than 75 microns, you get 8-bar pressurized. 1 bar
18 is 14.5 psi, so 8 bar is about 100, 120 psi pressurized.

19 If you have half of it smaller than
20 500 microns, half of it larger than 500 microns, the
21 standard says it's not explosible, but the test results
22 show you that it's 7.5 bar, so it's like 110 psi, so that's
23 obviously wrong. Then if it's larger than 500 microns and

1 smaller than 853 microns still 5 bars, it's still 5 bars so
2 that's 75 psi.

3 So is there -- I presented a paper at the
4 2009 Dust Symposium that part of it dealt with this issue.
5 Is there a right particle size for a threshold, and the
6 answer is yes, but that depends on the dust, what type of
7 dust it is, and more importantly, what is the morphology of
8 the particle; in other words, what's the shape of the
9 particle.

10 So here in that paper, you have it in
11 NFPA records, May 2009 Dust Explosion Symposium for certain
12 aluminum particles, spherical aluminum particles, it came
13 out about 100 microns. That's the magic particle size. If
14 it's more than 100, then it's not explosible.

15 For coal dust, that's nearly spherical,
16 may be cubicle. It came out 250 microns for a particular
17 coal dust, and for the wood dust, we have shown for that
18 particular type of wood, tree bark, it came out more than
19 800 microns. So it's also in the answers to my appeal.

20 There were some comments made saying
21 that, you know, we try to get everything tested. That's
22 not what we are trying to do. We are saying for your
23 operation, if you're producing certain dust, just test one

1 dust, characterize the particle size and decide what is the
2 appropriate particle size for your application and for your
3 dust, for your particle morphology. You don't have to do
4 it for all the dust. You just pick one size and then test
5 it. The test is \$250. So that way you would do it right
6 and you wouldn't stick NFPA's neck out for liability.

7 And the last part I wanted to mention is,
8 you know, we argue here about what's the right particle
9 size. What OSHA does -- and I confirmed this with the OSHA
10 test, the manager of the OSHA test lab in Salt Lake City --
11 what they do is they take the sample from the operation,
12 dust collector or whatever the operation they have, and
13 they test it as received in the 20-liter chamber, and they
14 look at the pressurized and decide whether the dust is
15 explosible or not. They do not look at what particle size
16 is the magic particle size. Thank you.

17 THE CHAIRPERSON: Thank you very much.
18 Mr. Mattos, do you want to speak on behalf of the
19 committee? And as I said, if you and Mr. Francis can kind
20 of split that time in your comments, that would be great.

21 MR. MATTOS: Okay. I've already submitted
22 most of this in writing, so I'm just going to kind of
23 summarize. The committee has historically used a

1 420-micron threshold for this, and at the ROP it was taken
2 out, and there was no size criteria at all. At the ROC the
3 committee recognized that doing that basically required
4 that everything had to be tested.

5 Seeing the errors in their ways, they
6 decided to put the size criteria back in. At that time
7 there was some discussion and it was decided to use 500
8 instead of 420 based on some FM test that had been done.
9 Erden brings up some good points and it's new material. We
10 did not have this during the discussions that we had. Had
11 we had it, maybe it would have gone a different direction.
12 Maybe the number would have been 1,000 microns instead of
13 500 microns, but we didn't have that so they went with 500.

14 That's the gist of it really. Going back
15 to the ROP wording will require the users to have
16 everything tested. That's the only way to define it is by
17 having it tested. We wanted to make the document user
18 friendly as it had been in the past, so we included the
19 size criteria then; we took it out and saw that was not the
20 way to go and put it back in. So it's really nothing new
21 here other than we increased the size from 420 to 500.

22 THE CHAIRPERSON: Thank you. Mr. Francis,
23 again, if you would just preface your remarks with your

1 name and affiliation.

2 MR. FRANCIS: Sam Francis, American Wood

3 Council, member of 664 Committee. The member companies of

4 American Wood Council are more than a little concerned

5 about this because one of the unintended consequences, of

6 course, is retest or testing everything, and wood is a

7 highly variable product. Unlike spherical pieces of

8 aluminum, wood dust is oddly shaped and so on, and so any

9 change in the production line is going to result in

10 necessity to test again. I personally don't know anybody

11 who will do these tests for \$250, but then that's not part

12 of my job, and it's going to be, the unintended consequence

13 is a significant increase in cost to the industry.

14 Having said that, during the ROP stage

15 the question was posed what is the problem that we're

16 trying to solve other than to make the definition in this

17 dust standard look like the definition in other dust

18 standards. And while there are reasons to do that, there

19 are equally, I feel, valid reasons to not do that because

20 of the differences and variability in the materials that

21 we're regulating here. So no, no problem has been defined

22 that we're trying to address.

23 At the time we had the hearing, the

1 studies that are alluded to weren't available, and had they
2 been, I'm not sure that, I don't share the chair's optimism
3 that some other value would have come forth. By the way,
4 the value 420 that exists in the 664 standard today was
5 based on some work done at FM, some research that they did,
6 so it wasn't simply created from nothing.

7 And the risk assessment and management of
8 risk is what this is all about. In at least one of the
9 submittals to this Council for this appeal, another
10 engineer in this field has said he has not seen, and this
11 was testimony I might add at the annual meeting, that no,
12 no incident has occurred in a facility that complied with
13 the then existing standard. Moreover, in a newspaper
14 interview following the Domino Sugar, which is not wood
15 dust, but in the Domino Sugar incident, the then head of
16 OSHA said had they merely complied with the existing
17 standard this wouldn't be an event.

18 So the member companies say we don't see
19 the problem that's being addressed. The proposed solution
20 to whatever problem is being addressed is expensive, and
21 the industry is concerned that the cost doesn't bring an
22 attendant benefit with it that's justifying the cost. So
23 that the committee's decision to stay with a number, a

1 finite particle size for which the definition addresses is
2 a position that we would like to support.

3 THE CHAIRPERSON: Thank you. I'm going to
4 open it up to questions from members of the Council.
5 Mr. Clary.

6 MR. CLARY: Shane Clary, member of the
7 Council, to Mr. Mattos. What criteria did you use to go
8 from the 420 micron to the 500-micron particle size; what
9 was the basis of that determination during your ROC.

10 MR. MATTOS: My recollection is that it was
11 some testing that Factory Mutual had done that was
12 discussed during the meeting, but I can't --

13 MR. URAL: Would you let me answer that?

14 MR. MATTOS: Sure, go ahead.

15 MR. URAL: I think Factory Mutual, it was
16 more like what the other committees were saying. The
17 standard says even in the ROP text it says dust is
18 explosible regardless of particle size and shape, but in
19 the annex and all the standards says, well, usually for
20 most dust it's 500 microns. So I think it was more to go
21 with that, am I correct?

22 MR. MATTOS: Yea, I would go with that, yes.

23 THE CHAIRPERSON: Okay, thank you. Jim

1 Pauley, chair of the Council. Mr. Ural, were you in
2 attendance at the ROC meeting?

3 MR. URAL: I was by phone.

4 THE CHAIRPERSON: By phone. And were the
5 points that you made to the Council today regarding the
6 issues that you've raised, did you raise those with the
7 Technical Committee as well?

8 MR. URAL: The phone connection was not as
9 good as it could be, but I essentially raised it, actually,
10 I was the one who submitted the proposal to get that
11 discussion going, I was the one who submitted the comment
12 to get the discussion going, and in fact, the committee
13 acted on my comment, not only they rejected my comment, but
14 they went back.

15 The only thing that's new here is this
16 one sheet of paper that shows beyond any reasonable doubt
17 that ROP, ROC's definition is deadly. That's the only new
18 thing. That paper was in existence but maybe we didn't
19 discuss that in the meeting, but I know Mr. Mattos asked
20 the FM --

21 THE CHAIRPERSON: Would you just for the
22 record instead of just saying that paper, could you just
23 describe that paper on the record.

1 MR. URAL: This is a Project Progress
2 Summary, Effect of Particle Size on Wood Dust
3 Explosibility, and it says draft initial results from an
4 ongoing research project disclosed to NFPA management and
5 NFPA 664 Committee members for the purpose of evaluating
6 the 2011 NITMAN on NFPA 664. And this was sent to the
7 Standards Council Secretary's Office on Thursday, and I
8 believe it was sent out to you guys, I mean to the
9 Standards Council on Friday.

10 THE CHAIRPERSON: Jim Pauley, chair of the
11 Council again. I just want to sort of follow through on
12 this line. So you submitted proposals to the committee
13 which were acted on and you submitted comments to the
14 committee which were acted on, you've taken it to the
15 floor, and I'm presuming when it came to the floor some of
16 this additional information you're talking about was
17 rebuilding that record on the floor of which the membership
18 didn't overturn. So I'm trying to understand from the
19 council's perspective and from a process perspective, you
20 know, what's the compelling evidence that the Council
21 should overturn the entire standards-making process in this
22 case in the actions of the technical experts?

23 MR. URAL: Well, the association meeting, it

1 wasn't the experts of dust present in the association
2 meeting. There were only a few people, and you know like I
3 do that the lobbying part rules in the association meeting.
4 And the committee meeting, you know, you have that the
5 composition of the committee. You know, there are some
6 old-timers that like to propagate the old ways; there are
7 some new people that come up with new ways of handling it.

8 And lastly, you know, we discussed the
9 same thing last year. Whether the, how much NFPA should
10 rely on on data or science when making these decisions. So
11 I mean I come to you to identify a problem for you to act
12 on. You know, whether you act on it or not, I don't have
13 any control on it, but my best judgment and the best
14 information I have shows you that it's a dangerous
15 condition, and I mean you may decide to wait for the body
16 counts. That's what, you know, the argument against it
17 seems to be.

18 The other argument against it seems to be
19 the cost, which is really not an issue. I mean there are
20 laboratories that do this test at \$250, and we don't say
21 that you have to test every single sample from every single
22 process. If you like the size criteria, just pick one size
23 and then test it and see if that's an appropriate criteria

1 for you, so you're talking about spending \$250. Doing also
2 the SIM analysis, you know, SIM analysis also costs money.
3 It costs time and money. If you send it to a laboratory,
4 they charge you more than \$250.

5 THE CHAIRPERSON: Ms. Brodoff.

6 MS. BRODOFF: Maureen Brodoff. Mr. Ural, the
7 document you were referring to is a one-page Project
8 Progress Summary Sheet --

9 MR. URAL: Yes.

10 MS. BRODOFF: -- that's how it's identified.
11 When would a full report be available for experts to review
12 and evaluate, or will it be made available?

13 MR. URAL: The people who wrote this document
14 are known as the experts in this field, and this was just a
15 preliminary test because we also want to do some large
16 scale tests as well, so this is an ongoing project. We are
17 waiting for the sample to come in, but it will be
18 published, we are aiming to publish the full paper at the
19 Loss Prevention Symposium which will be early next year.

20 MS. BRODOFF: So the full results you're not
21 going to go make available until next year?

22 MR. URAL: You can have the full results --

23 MS. BRODOFF: I just want the answer to the

1 question.

2 MR. URAL: I'm trying to answer; I'm trying
3 to answer. This was based on one particular wood dust
4 sample that shows that the material is incorrect. So you
5 can have the full results from this test series to, you can
6 have the full results from this test series immediately. I
7 mean the machine that does the test spits out reports.
8 It's not in the form of an ISO report, but it's a report
9 that would be read and understood with all the experts. Am
10 I answering your question?

11 MS. BRODOFF: Well, I guess I --

12 MR. URAL: If I may say one more sentence.
13 You know, buying a bark from the pet store and then
14 grinding it is not an easy process, and when you do the
15 large scale test, you need pounds and pounds of that
16 sample, so that's why we couldn't do that in a cost
17 effective way. So we have ordered some samples with the
18 large particle size. We are going to run the tests with
19 that sample as well.

20 THE CHAIRPERSON: Ms. Brodoff.

21 MS. BRODOFF: Thank you. I guess what I'm
22 asking is that this describes some results without giving
23 any details as to how the testing was done or various other

1 things that I would expect --

2 MR. URAL: Oh --

3 MS. BRODOFF: If I may.

4 MR. URAL: Go ahead please.

5 MS. BRODOFF: I would expect you would expect
6 to see in a full report of results, and what I am wondering
7 is since the Technical Committee would be in a far better
8 position to evaluate this material than the Standards
9 Council which is not in a position to evaluate it even
10 based on this one sheet, whether you would be willing to
11 make that information available if in fact you feel it
12 demonstrates the danger that you are alleging.

13 I don't think the Technical Committee has
14 to accept your conclusions without seeing the full
15 information about the testing, and this was information
16 that was not available to them at that time. So I'm
17 wondering whether you might consider bringing this
18 information back to the committee as an interim amendment,
19 for example, if the Council doesn't agree with you in terms
20 of what its power is.

21 MR. URAL: Yea, I will certainly do that, but
22 let me, because most people in the Standards Council is not
23 familiar with this particular test method. There is an

1 ASTM test method, a procedure, ASTM E1226. That specifies
2 the equipment, that specifies how you ignite it, and that
3 specifies how you create the dust cloud and what you look
4 at to decide whether the material is explosible or not. So
5 that one you can have right away. I can give it to you
6 today, or the committee --

7 MS. BRODOFF: I don't think -- sorry to
8 interrupt but I just wanted to emphasize. My question was
9 directed to how we could get this information to the
10 Technical Committee.

11 MR. URAL: Beyond this there isn't much
12 information in the full textual report, but then we can
13 provide the information from the, from the, you know, what
14 the equipment produces and -- what was I going to say...

15 THE CHAIRPERSON: Ms. Brodoff, did that
16 answer your question?

17 MS. BRODOFF: Yes.

18 THE CHAIRPERSON: Mr. Huggins.

19 MR. HUGGINS: No, it was taken care of.

20 Thank you.

21 THE CHAIRPERSON: Okay. Other questions from
22 members of the Council? I'm going to give Mr. Ural a quick
23 5 minutes, if you will, for any closing remarks that you

1 have that you haven't covered on anything. Gentlemen, I'll
2 do the same, Mr. Mattos and Mr. Francis, the same for any
3 closing remarks you may have. So Mr. Ural, you have the
4 floor.

5 MR. URAL: Thank you for listening to me. I
6 know it's late in the afternoon. Although this is new, the
7 committee has access to the Factory Mutual report. In
8 fact, Mr. Mattos asked if the committee has a
9 representative from Factory Mutual, and Mr. Mattos asked
10 that Factory Mutual representative to go look at the FM
11 database, and I don't know if that was ever brought back to
12 the committee, but the fact remains FM Global did publish a
13 paper before I did, and they got a K of 80 bar meters per
14 second for wood dust with a mass medium particle size
15 greater than 500 microns.

16 So that's a full paper documented. It's
17 in the, it was an NFPA, presented in the NFPA meeting, so I
18 don't know, I don't think you should wait to act on it to,
19 you know, the final results of this study. This is a
20 different study.

21 But if you do it, I mean I'll cooperate
22 as best as I can to make things happen because I know this
23 is in a very dangerous situation. I know it puts NFPA into

1 unnecessary liability. I know it shifts the burden of
2 liability because companies, they look at the explosibility
3 issue. They do a process hazard analysis and then they
4 assume the risk at their own peril. What certain companies
5 are trying to do is they don't want to assume the risk,
6 instead they want the NFPA to assume the risk, and I object
7 to that. Thank you.

8 THE CHAIRPERSON: Thank you. Mr. Mattos.

9 MR. MATTOS: The discussion seems to have
10 evolved into this particle size issue and that's not what's
11 before you today. The question is do we have any size
12 criteria at all, and the appeal is seeking to remove that
13 requirement completely so there will be no size criteria
14 mentioned at all. The committee feels that there should be
15 a size criteria and would certainly entertain any
16 additional evidence to address that. The best information
17 we had available to us at the time, we went with the 500.
18 There is also a moisture content factor to that definition
19 that would also need to be discussed, but I just don't want
20 to get hung up on the size criteria because that's not what
21 you're being asked to evaluate today. Were we addressing
22 both of the appeals at the same time?

23 THE CHAIRPERSON: Yes, for both and, or

1 comment 664-5 and dash 6.

2 MR. MATTOS: There's no been no discussion at
3 all on the second one.

4 THE CHAIRPERSON: I believe Mr. Ural really
5 said he focused on 664-5 is the most critical element of
6 that. From our perspective, they both dealt with the
7 terminology issue in relation to that, so that's why we
8 tied them together.

9 MR. MATTOS: Okay, I'm done.

10 THE CHAIRPERSON: And we also have written
11 materials on both of those --

12 MR. URAL: I mean both of them are important,
13 but I figure this is the most serious one. And will I be
14 able to comment after?

15 THE CHAIRPERSON: No, we're at closing
16 comments at this point. You've had your closing comments.
17 I'm going to ask Mr. Francis with the last couple of
18 minutes that are left out of those closing comments if
19 there's anything he would like to say.

20 MR. FRANCIS: Well, at risk of minimizing
21 what Art just said about losing focus and looking at
22 particle size, let me just say that 420 came from research
23 done by FM. We didn't just pull that out of the air, no

1 pun intended. So when the committee put that in a long
2 time ago, there were reasons for it. There's, the question
3 is the definition of explosible. You've heard all the rest
4 of it, but this is a question of risk analysis and cost
5 benefit by redefining the whole process based on something
6 other than a simple particulate measure.

7 MR. URAL: May I make one more comment?

8 THE CHAIRPERSON: No. I've been very, very
9 clear about how we're going to operate the hearing.

10 MR. URAL: You have.

11 THE CHAIRPERSON: And that's exactly how we
12 followed the process. So with that I'm going to bring this
13 hearing to a close, and that will close the elements on
14 NFPA 664. I want to thank you gentlemen for your
15 participation in today's hearings.

16 The information you provided to the
17 Standards Council is very valuable in helping us evaluate
18 and make our decisions, and this particular item will be
19 decided by the Standards Council and the decision will be
20 issued by a written decision by Ms. Cronin, the secretary
21 of the Standards Council. No member of the Council nor
22 member of NFPA staff is permitted to convey any of that
23 information on the decision. That written communication

1 will stand as the communication from the Council on this
2 issue. So that will close this particular hearing.

3 I want to go ahead and move directly into
4 Agenda Item 11-8-12A which is on NFPA 704. It has to do
5 with certifying amending motion 704-2. Mr. Ural, you are
6 the appellant on this particular item as well. Is there
7 anyone else speaking in favor of this appeal? Is there
8 anyone speaking in opposition to this appeal?

9 MR. URAL: I want to speak in favor of the
10 appeal.

11 THE CHAIRPERSON: Right.

12 MR. URAL: Do you mean anybody else?

13 THE CHAIRPERSON: Correct, I was asking if
14 there's anybody besides yourself. So what we'll do since
15 no one is speaking in opposition, Mr. Ural, I'm going to
16 give you ten minutes to describe again the issue to the
17 Council and highlight anything. Again, we have the written
18 material that has been submitted. I'll then take any
19 questions from members of the Standards Council. After
20 that any brief closing remarks you may have and then we'll
21 bring that hearing to a close, so please begin.

22 MR. URAL: Good afternoon again. Right now
23 we are talking about, if anybody doesn't know, the

1 placards. The same information is also provided in the
2 material safety data sheets and also labels on shipping the
3 product. So NFPA 704 provides a simple regularly
4 recognized and easily understood system of marking that
5 provides the general idea of the hazards of a material and
6 the severity of these hazards as they relate to emergency
7 response.

8 This is the part. I'm reading from the
9 standard. "The objectives of the system are as follows:
10 One, provide an opportunity, appropriate signal or alert to
11 the on-the-spot information to safeguard the lives of both
12 public and private emergency response personnel; two, to
13 assist in planning for effective fire and emergency control
14 operations including cleanup; and three, to assist all
15 designated personnel, engineers and plant and safety
16 personnel in evaluating the hazards.

17 This system provides basic information to
18 firefighting, emergency and other personnel enabling them
19 to easily decide whether to evacuate the area or to
20 commence emergency control procedures. This system also
21 provides those personnel with information to assist in
22 selecting firefighting tactics and emergency procedures.

23 So when you look at this, they put the

1 hazard into different categories. Zero is minimal hazard,
2 one is slight hazard, two is moderate hazard, three is
3 serious hazard, and four is severe hazard.

4 I came to the NFPA library and did some
5 research on how the document has evolved. In the eighties
6 and earlier they rated the combustible dust four, then in
7 the nineties they rated it to three, and in the 2000s they
8 rated it to two. So as the hazard awareness is increasing
9 and we are experiencing all these problems, NFPA is
10 reducing the hazard rating of the materials.

11 And the table that I am challenging, I
12 have been challenging -- by the way, I am not a member of
13 this committee, but I have identified the problem. I put
14 in, I'm on the waiting list to be a member of that
15 committee, and I put in a proposal, the committee was not
16 very responsive, then I put a comment, the committee was
17 not responsive. But part of the system that works is we
18 had, after I filed a NITMAN, the committee was more willing
19 to hear me out and we had a meeting, and some of the
20 members they agree with me, not all the members they agree
21 with me, and hopefully, they will be, if this body doesn't
22 agree with my appeal, they will try to change the cycle
23 from 5 years to 3 years. So some of the members agree with

1 the problem.

2 In the table in question for the
3 flammability, we have clear criteria. It says Category 4,
4 severe hazard is for flammable gases, volatile liquids or
5 pyrophoric materials, Category 3 is material that would
6 ignite at ambient temperature, and 2 is ignite when
7 moderately heated. So I think most of the people here they
8 know this for the flammable liquids, but the dust is the
9 same thing, whether you can ignite it. Like the wood dust
10 you can ignite it with a match as a layer, but the other
11 dust like a phenolic resin you couldn't ignite it with a
12 match at room temperature as a layer, but if you disperse
13 it into a cloud, a dust cloud, you could ignite it at room
14 temperature. So that's why I think it should be a three,
15 ignites at ambient temperature.

16 And so that's pretty much the gist of it.
17 There was a little bit, I want a little bit to talk about
18 the committee. This is a really small committee, I believe
19 it's less than ten people, and then the committee has three
20 subspecialties. One is the people who are familiar with
21 the flammability aspects, other flammability with the
22 health aspects, and the third one is the people familiar
23 with the reactivity aspects. So when you have such a small

1 committee, that makes it vulnerable to lobbying by our
2 special interests.

3 And finally, you can look at the -- I
4 just looked at the Internet last night. You can get these
5 material safety data sheets; you can see NFPA diamond.
6 This is one for, this is for phenolic resin. About seven
7 people were killed in the explosion in Kentucky, seven
8 people were killed, and I don't know, 40 people were
9 injured. I have investigated that loss, and you can see
10 they're rating it a hazard rating of one, slight hazard.

11 Most of you guys know this sugar dust
12 explosion in Georgia. Again, in the Material Safety Data
13 Sheet, you'll see the NFPA diamond. So that's why it is
14 important to get it correctly and do it right and make it
15 consistent. So with that, I'll stop and get your
16 questions. Now I'm learning the process.

17 THE CHAIRPERSON: I'll open it up to
18 questions from members of the Council. Mr. Harrington.

19 MR. HARRINGTON: J. C. Harrington, member of
20 Council. I was looking at the information that we were
21 submitted and with your ROC comment that was submitted, I
22 know you made a comment that this is a very small
23 committee. I guess it indicates there are 13 voting

1 members on the committee.

2 MR. URAL: I think --

3 MR. HARRINGTON: Well, if I could continue.

4 MR. URAL: I'm sorry.

5 MR. HARRINGTON: Thank you. 13 voting
6 members on the committee. Apparently there were a few
7 nonreturned ballots but at ROC this was voted down ten to
8 zero, so that 10 people voted it ten to zero. I know
9 you've made a comment that you subsequently had
10 discussions, informal discussions, with the committee
11 members since it went to vote, but of those informal
12 discussions you had, you said there was some sentiment
13 supporting what you had. Of the 13 members or so on the
14 committee, is it your sense that there was a majority
15 committee support in favor of your sentiment, or was it
16 still somewhat in the vast minority like this vote was?

17 MR. URAL: Denise can tell, give you a better
18 indication. One of the members had recognized the issues
19 that I was putting in and then he called for a committee
20 teleconference, and I participated in that, and I forgot
21 how many people participated. It wasn't that many people.
22 And in that group, maybe because they see value in what I
23 said, most people agreed with me except one. He said, you

1 know, he wouldn't agree with me. So, but at least at that
2 time I was listened to and I really appreciated that and it
3 inspired some hope in me.

4 THE CHAIRPERSON: Jim Pauley, chair of the
5 Council. I just to that very point I want to clarify. Is
6 the teleconference you talked about after the ROP and ROC
7 were completed?

8 MR. URAL: And after, I believe it was even
9 after the association meeting.

10 THE CHAIRPERSON: Okay, thank you.
11 Mr. Harrington, was that all?

12 MR. HARRINGTON: Yes, I'm all set, thank you.

13 THE CHAIRPERSON: Mr. Milke.

14 MR. MILKE: Jim Milke, a member of Council.
15 A question on the small modest size of this committee that
16 you talk about. I don't know the make-up of that committee
17 I have to say, but there are dust committees here who
18 certainly appreciate dust explosion hazards and the like.
19 Does that expertise sit on this committee in some fashion;
20 is there some crossover to that?

21 MR. URAL: Because I'm not a member of that
22 committee I really don't know, but I remember Mrs. Denise
23 Beach telling me it was less than ten people on the

1 committee right now. And there is certainly a dust
2 explosion expert, Larry Briton is on that committee, so I
3 value his opinion, and in fact, he is the one who called
4 the committee conference for me. Was I able to answer your
5 question?

6 MR. MILKE: Yes, thank you.

7 THE CHAIRPERSON: Other questions? Okay,
8 seeing none, Mr. Ural, any closing comments?

9 MR. URAL: Well, I appreciate this
10 opportunity, and hopefully, I won't have to see you next
11 year.

12 THE CHAIRPERSON: Great, thank you. With
13 that, we will bring this hearing to a close. And, again, I
14 just want to remind everyone and, Mr. Ural, thank you for
15 being here for both those hearings. We appreciate your
16 participation in the process.

17 MR. URAL: My pleasure.

18 THE CHAIRPERSON: This item will be issued by
19 a written decision of the Council. That will come from Ms.
20 Cronin, the secretary of the Standards Council, and, again,
21 I want to reiterate no member of the staff nor member of
22 the Standards Council is permitted to convey any of that
23 information from the Council decision. That written

1 decision will speak for the Council.

2 With that, I'm going to bring this

3 hearing and our, unless I have another page of paper I'm

4 missing, our entire day of hearings to a close, so we can

5 go off the record please.

6 (Whereupon the proceedings adjourned at

7 3:41 p.m.)

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CERTIFICATE

I hereby certify that the foregoing 113 pages contain a full, true and accurate transcript of all my stenographic notes to the best of my ability taken in the above-captioned matter held at the offices of NFPA on August 9, 2011, commencing at 12:57 p.m.

KATHLEEN M. BENOIT

Notary Public

My commission expires

May 25, 2012

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