

State Fire Marshal Questions  
Plan Review Seminar  
LA-AFAA Quarterly Meeting March 27, 2009

**Question No. 1**

The fire alarm control panel requires a dedicated branch AC circuit.  
Can we put the voice evacuation panel on the same AC circuit?

*Yes.*

Can we put auxiliary power supplies on the same AC circuit?

*Yes.*

Can we put 120VAC single station area smoke detectors on the same AC circuit?

*Yes.*

**Question No. 2**

We were told by a field inspector that all ceiling strobes must be a minimum of 177 candela.  
This must be a miscommunication somewhere?

*That is incorrect. This is not a requirement of NFPA 72, NFPA 101 or ADA-AG.*

**Question No. 3**

If all of our system is operating properly but the elevators do not recall properly, are we allowed to green tag the system and notify the owner?

*It is recommended that a yellow tag be placed on the system and notice to the owner made to make the necessary repairs for the elevator recall. However, if a green tag was placed on the system, it would not be considered a violation assuming all other aspects of the system was operating properly.*

**Question No. 4**

It is my understanding that Daycare Facilities that are owned and operated by churches are exempt from ADA requirements. Does this mean they are exempt in all their business ventures, restaurants, bingo games, bakery, etc?

*Yes.*

### **Question No. 5**

NFPA 90A requires duct detectors for AHU's with CFM's between 2,000 and 15,000 to be located on the supply side of the unit. Whenever the Mechanical Contractor installs the duct detectors on that size unit, it is always placed on the return side. What Code do they follow that contradicts NFPA 72?

***International Mechanical Code, Section 606.2.1 Return air systems. Smoke detectors shall be installed in return air systems with a design capacity greater than 2,000 cfm (0.9 m3/s), in the return air duct or plenum upstream of any filters, exhaust air connections, outdoor air connections, or decontamination equipment and appliances.***

### **Question No. 6**

Does the Code require back up amplifiers for Voice Evacuation Systems under certain circumstances? If so, what section can be found?

***No. This office is unaware of any such requirements.***

### **Question No. 7**

If the SFM reviews a plan for both Building Code compliance and Life Safety Code compliance is he (the fire alarm contractor) then required to install duct detectors on both the supply and return ducts?

***Yes, if the unit exceeds 2000 cfm and regardless of who reviews the shop drawings, duct detectors are required on both the supply and return side because both set of codes were adopted by the state.***

### **Question No. 8**

"Track Your Plans" on the State Fire Marshal's Website is really a quick and efficient way to check the status of the progress of your submitted plans. However, it is usually a best guess as to how the plans were logged in. Unless you know exactly how they were entered into the system, you will never be able to find them. Can a more consistent method be used to log in the plans so we can be assured to find them during our search? Perhaps they could be associated with our Firm's License Number?

***Joe Delaune to discuss.***

### **Question No. 9**

Does the completion of (4) quarterly fire alarm system inspections performed in a (1) year period of time satisfy the requirement of the yearly inspection and test of the system?

***No, there must be one point in time that the system is completely certified per Chapter 10 of NFPA 72. Because inspection frequencies may differ, something could be working at the***

*semi-annual inspection but not at the annual; therefore, the entire system must be certified at a minimum once a year.*

**Question No. 10**

- A. Does the Office of State Fire Marshal plan to sponsor any legislation this session that will revise the Louisiana Life Safety & Property Protection Act?

*Proposed changes to the Licensing Law have been written and the agency will request industry's support to these changes.*

- B. If yes, could you please elaborate?

*Here is a basic summary of the changes:*

- 1. Created endorsements for Special Locking, Hood/duct Cleaners, Hood/duct Specialist*
- 2. Eliminated endorsements of Door Hardware, Limited Locksmith*
- 3. Added a few new definitions*
- 4. Clarified SFM's authority*
- 5. Clarified Lockout Code Section*
- 6. Allowed out of state Property Protection Firms to operate without a physical office in LA*
- 7. Added allowance for Temp Workers*

**Question No. 11**

Can you provide this Association a final draft of the Sprinkler Rules, assuming they have been promulgated?

*The rules will be promulgated next month. I will send a copy to Roger when I get them back.*

**Question No. 12**

I am of the understanding that there is nothing in the Louisiana Contractor Licensing Law, or the Louisiana Life Safety and Property Protection Act that prevents a licensed contractor from sub-contracting fire protection work to a fully certified firm in that field?

Some building owners wish to deal with a single contractor, ie. Fire Alarm Company, and ask them to coordinate and sub-contract Sprinkler, or Fire Suppression systems inspection. Years ago, I was reported to your office for performing Sprinkler inspection work, (I already had sub-contracted) based on a State Agency using a copy of my company's deficiency letter to get bid prices. After consulting with Jerry Jones and others, it was determined to be acceptable and that no rules or laws were violated.

I was recently audited and your inspector placed a call to Boyd Petty on this subject. He stated my firm could only sub-contract a "Sprinkler Inspection" if my firm was licensed as a Sprinkler Contractor by your office, or if the Sprinkler Contractor invoiced the building owner directly. There is no point in sub-contracting work if your company is certified in that field.

- A. If you agree with the inspector's explanation, then please cite the section of the law or rules that prevent one licensed contractor from sub-contracting to another. Please note that in new construction, it is common practice for the Mechanical Contractor to sub-contract with a Sprinkler Contractor, who in turn sub-contracts an FM-200 system to a Suppression Contractor.

***Yes, I agree with the inspector's explanation. The Licensing Law specifically prohibits a contractor from holding itself out to perform work it is not licensed for. This is found in R.S. 40:1664.4 A which states you must be licensed to perform Life Safety and Property Protection contracting and in the definition of Life Safety and Property Protection Contracting found in R.S. 40:1664.3 (37) which includes "holding oneself out to perform any such task" as requiring a license. Subcontracting where the building owner is not made aware of that another contractor is performing the work would be considered as "holding oneself out to perform any such task".***

My firm is licensed by the Contractors Licensing Board as a "Sprinkler Contractor" and has been for 25 years. Does this have any impact on the answers to question no. 12A above?

***Unless your firm has a sprinkler contractor's endorsement issued by the fire marshal, you would be in violation of the Licensing Law.***

- C. If one Certified/Licensed Contractor can not subcontract to a Fire Protection Contractor in a different discipline, isn't this restraint of trade?

***No, the way to handle this is either get licensed for the work you want to do or clearly show on all work orders, billing etc. what each firm is doing.***

- D. According to your office's interpretation, any state licensed contractor can sub work to certified fire protection contractors, but one contractor certified by your office can't sub to another certified contractor?

***This is not correct. A certified fire protection contractor can sub-contract to another but the work billed to the customer must be clearly distinguished so there is no confusion of who did what.***

1. Does this keep a company from sub-contracting hydrostatic test to firms certified for this work?

***If this is a DOT cylinder, then a specialized DOT certification must be held. If the cylinder is to be put back together by the hydrostatic test firm (i.e. the valve is replaced and cylinder recharged), then the hydrostatic test firm would also need the specific endorsement for the type of cylinders being repaired (i.e. either a portable fire extinguisher or suppression endorsement).***

2. Does this keep alarm companies from having Halon/FM200 cylinders filled and serviced by suppression companies?

*Yes, but only if the alarm company is going to bill the customer for filling the cylinders. Again, the solution would be to show on the bill what the suppression firm did and what the fire alarm firm did.*

***JUST BE CLEAR ON THE BILL OR GET LICENSED FOR WHAT YOU WANT TO DO!!!!!!!***

### **Question No. 13**

Has your office had any dialogue with the State Contractors Board, questioning them on issuing contractor's licenses (over \$50,000) to companies not certified by your office (i.e. contractors "sprinkler work" license)?

*No.*

### **Question No. 14**

This Association has on numerous occasions asked your office to consider assigning "P" numbers to red tag notifications, so they can be more easily tracked. What's the current status of that request?

*Steve Gogreve to discuss.*

### **Question No. 15**

This Association has on past occasions (Based on membership Votes) asked your office to reinstate signature lines on Plan Review & Exemption Request Forms. What's the current status of this request?

*Joe Delaune to discuss.*

### **Question No. 16**

Can you bring this Association up to date on the status of video conferencing between the various locations of State Fire Marshals offices?

*Joe Delaune to discuss.*

## Question No. 17

This question concerns the State Fire Marshal Advisory Board and Continuing Education Requirements.

A Any word from the Governor's office on reappointments or new appointments?

*Names have been sent to the Governor's office and we are awaiting appointment notice.*

B What is the status of the Contact Hour "Log Form" the Advisory Committee developed? I don't believe the final version was ever issued. Regarding this form; inspectors seem to be looking only for contact hour certificates. Many safety companies only issue Certificates of Training, without contact hours. Since most safety training is 1-2 days and only valid for (2) points per day, is the inspector being unreasonable on insisting a Contact Hour Certificate be present, when Safety Training Certificates are in the file?

*A complete memo regarding this log and other recent issues addressed by the Board has not been sent out yet. It is on the list to do and will be completed some time in April.*

C Are business owners required to issue Contact Hour Certificates for any "in-house" training that was deemed acceptable by the Advisory Committee for Continuing Education?

*Some record must be made by a business for each employee who has received approved "in-house" training. This does not have to be a certificate but must be documented (i.e. a letter or sign in sheet with the topic of training noted) somehow in the employee's file.*

## Question No. 18

NFPA 72 (2002) Paragraph 6.11.7 calls for monitoring of alarm, trouble, and supervisory signals whenever a suppression system is installed in a building with a fire alarm system. The fire alarm companies are not aware of this and insist only alarm needs to be connected..

A Could your office add this as a cautionary note on suppression system reviews?

*Joe Delaune to discuss.*

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*Joe Delaune to discuss.*

**Question No. 19**

Many months ago, Mr. Jean Carter was working on a memo outlining your office's enforcement of new safety requirement; ie. signs, discharge delays, odorizers, pressure operated sirens as required by NFPA 12 (2005). The implementation date was extended by NFPA, but now it has been implemented. Industry needs to know your office's position on yellow tagging existing CO2 systems not in compliance with these requirements. Can you complete and issue Mr. Carter's memo?

*Joe Delaune to discuss.*