

Water-Based Fire Protection System Tagging Review

Final Report
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THE
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Executive Summary:

For several cycles, the technical committee for NFPA 25, *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*, has discussed the concept of adding a chapter on system tagging. Since there are several different statewide or local tagging programs that exist, the committee has not been able to identify and study all of them to form the basis of a program that is suitable for the standard.

The goal of this project was to compile available information on state and city tagging requirements and provide that information to the NFPA 25 technical committee to serve as the technical basis for any tagging program for the standard. For this purpose, a survey was sent out to all the state fire marshal's offices and various city fire marshal or fire department's offices to gather the information about: the adoption and enforcement of NFPA 25, the tagging requirements or reporting system for water based fire protection system, and the willingness of each state to adopt the annex guidance for a tagging program if provided by NFPA 25.

Forty-six out of fifty states and nine out of ten cities contacted throughout the United States responded to the survey. Twenty-eight states and seven cities directly adopt NFPA 25; whereas, sixteen states and two cities adopts NFPA 25 by reference. The 2011 edition of NFPA 25 is the most adopted or referenced edition, both in states as well as cities. According to the survey results, the number of states having their own tagging requirements is significantly less than those states that do not have their own tagging requirements. Seventeen of the responding states indicated that there were tagging requirements. It is more common for cities to have tagging requirements with five of the responding cities indicating tagging requirements in the jurisdiction. The specific tagging requirements varied considerably for each jurisdiction. In general, the third party reporting systems are less frequently used at the state level as compared to the city level. However in some states, third party reporting systems are used at the local level such as in a few local municipalities, districts, cities or jurisdictions.

Regarding the likelihood of adoption or changing of existing programs in state and metro level, if an annex guidance for a tagging program were provided in NFPA 25, the responses were mixed. Many of the states that responded favorably or remained neutral expressed a need for consideration or a review of the proposed annex guidance before acceptance. The need for a compelling reason for change was mentioned, as well as an apprehension to changes that could prove to be too far from practices currently in place.

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1. Introduction and Background

For several cycles, the technical committee for NFPA 25, *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*, has discussed the concept of adding a chapter on system tagging. One of the reasons that this has not been done is that there are several different statewide or local tagging programs that exist and the committee has not been able to identify and study all of them to form the basis of a program that is suitable for the standard.

The goal of this project was to compile available information on state and city tagging requirements and provide that information to the NFPA 25 technical committee to serve as the technical basis for any tagging program for the standard.

The project focused on collecting the water-based fire protection system tagging requirements and related information through the following specific tasks:

Task 1: Gathered information on:

- 1) Which states adopt NFPA 25, who enforces the requirements in NFPA 25, what is the level of frequency of enforcement of NFPA 25;
- 2) What states have their own tagging requirements, what are the specific tags, how are the tagging requirements enforced, what reporting form is used, who is authorized to tag a system;
- 3) For states that don't have tagging requirements, what method of enforcement/reporting is being used;
- 4) What states use third party reporting systems;
- 5) If NFPA 25 were to provide annex guidance for a tagging program, what states would be likely to adopt a program or change their existing program to match it?

Task 2: Analyzed the information gathered in Task 1 and identify any commonalities in the various approaches.

Task 3: Developed a report with the findings from Task 1 and 2.

2. Tagging Requirements at the State Level

By sending out a survey to the state fire marshals throughout the country, information about the adoption and enforcement of NFPA 25, the tagging requirements or reporting system for water based fire protection system, and the willingness of each state to adopt the annex guidance for a tagging program if provided by NFPA 25 was gathered. The survey questions are included in the Appendix.

The responses from the states were gathered over a period of months and are presented below. A summary of responses follows.

Alabama

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

Yes, currently the 2002 edition of NFPA 25 is adopted. Alabama is in the process of adopting the codes as published in the 2013 edition of the National Fire Codes.

- b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)**

The State adopts the minimum standards and inspect upon complaint. Local jurisdictions perform routine inspections.

- c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)**

See B above.

- 2. Do you have mandated tagging requirements for water-based fire protection systems?**

No mandated tagging requirements

- 3. If you have no tagging requirements, what method of enforcement/reporting is being used?**

Fire sprinkler contractors are required to send reports showing any deficiencies to the State, then the copies are forwarded to local jurisdictions.

- 4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)**

Third party software is not used.

- 5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?**

Yes, Alabama would consider adopting tagging requirements.

Alaska

- 1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?**

Yes

- a. If yes, which edition is adopted?**

2008

- b. If yes, who enforces NFPA 25 requirements?**

Fire Officials

- c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions?**

Please see below.

13 Alaska Administrative Code 50.025. Fire Code (29) Chapter 9, Section 901.6 (Inspection, testing and maintenance) of the *I.F.C.*, is revised by adding a second

paragraph to read: "Superseding other code or standard requirements established by this section, fire protection systems and fire extinguishers must be inspected, tested, and serviced as follows:

1. Annually. Exception: Standpipe systems must be inspected, tested, and serviced every five years;
2. After any use or activation;
3. Any time damage is found;
4. After repair or alteration;
5. When required by the fire code official;
6. After a seasonal shutdown.

2. Do you have mandated tagging requirements for water-based fire protection systems?

a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)

13 Alaska Administrative Code 50.035. (c) A company that engages in the design, installation, or maintenance of a system shall record its work by annotating plans, test certificates, inspection reports, and system inspection tags with the permit holder's permit number, or professional engineer's registration number or seal.

b. If yes, how are the tagging requirements enforced?

Fire Officials

Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system?

No, Alaska relies on fire system reports.

For systems tagged as having an impairment, do you have a required time frame to fix the problem?

This is determined on a case by case basis and depends on the type/cause of impairment.

c. If yes, what reporting form is used?

See below for *Appendix K Fire Status Reporting*.

Is there a jurisdiction specific form?

Jurisdictions have the ability to adopt a specific form.

d. If yes, who is authorized to tag a system?

Permit holders

Who can remove a tag from a system?

Permit holders

4. **Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)**

No

5. **If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?**

Only if it added value to what we are already doing, they do not advocate change for the sake of change.

"APPENDIX K FIRE STATUS REPORTING"

K101 (Scope). All fire service companies providing services in the State of Alaska shall provide a legible copy of all fire system service reports to the closest state division of fire and life safety office as adopted and amended to the 2009 International Fire Code as listed in this appendix.

Exception: Industrial occupancies with a fire system preventive maintenance program approved by the division of fire and life safety. This appendix contains contact information.

K102 (Status 1). Systems out of service or major deficiencies. The fire service company shall immediately contact the closest state division of fire and life safety office, if the system cannot be returned to service. On a weekend or after hours, contact the closest state division of fire and life safety office on the first business day. Written notification shall be faxed to the closest state division of fire and safety office within 24 hours. Notification may be made by electronic mail to the division.

K102.1 Corrective Action time. Status 1 reports shall be repaired immediately.

K102.1.1 For example

K102.1.1.1 Fire Sprinkler or Water Based Systems:

1. Non-working flow or pressure switches;
2. Damage to fire department connections;
3. No water to system;
4. Frozen or otherwise damaged system.

K102.1.1.2 Fire Pumps:

1. Non-working fire pumps;
2. Fire pump controls not working or malfunctioning.

K102.1.1.3 Fire Alarm Systems (detection and alarm):

1. Non-working fire alarm panel;
2. Malfunctioning fire alarm panel;
3. Audio and visual devices not working entire loop;
4. Detection not working entire detection loop;
5. Loss of programming.

K102.1.1.4 Kitchen Hood Fire Systems:

1. System cylinder is not charged or leaking;
2. Appliance not properly covered due to rearrangement of appliances;
3. Plugged discharge nozzles;
4. Automatic detection not functional;
5. Gas or electric not shutting down.

K102.1.1.5 Clean Agent or Special Hazard Systems:

1. System cylinder is not charged or leaking;
2. Releasing panel not functional.

K103 (Status 2). Systems that have critical deficiency reports shall be provided to the closest state division of fire and life safety office within 14 days.

K103.1 Corrective Action Time: Status 2 systems shall be repaired within 14 days.

K103.1.1 For example,

K103.1.1.1 Fire Sprinkler or Water Based System:

1. Five or more painted sprinkler heads in a concentrated area or more than 10 in a facility;
2. Change of use that will affect the performance of the sprinkler system;
3. Low water pressure;
4. Any other major problem that will affect the performance;
5. No monitoring on required systems.

K103.1.1.2 Fire Pumps:

1. Low fuel;
2. Pump packing leaking beyond specifications;
3. Fire pump room below 40 degrees;

4. Fire pump not meeting its rated discharge pressure or GPM flow over a 10 percent difference;
5. Any other major problem that will affect the performance.

K103.1.1.3 Fire Alarm Systems (detection and alarm):

1. Batteries overdue for replacement;
2. No monitoring on required system;
3. Audio and visual devices not working, up to three devices, over three devices status 1;
4. Detection not working, up to three devices, over three devices status 1;
5. Any other major problem that will affect the performance.

K103.1.1.4 Kitchen Hood Fire Systems:

1. Hood and ducts with heavy grease buildup;
2. Any other major problems that will affect the performance.

K104 (Status 3). Minor deficiency reports shall be provided to the closest state division of fire and safety office within 30 days. These deficiencies will not affect the performance of the system.

K104.1 Corrective Action Time: Status 3 systems shall be repaired within 30 days.

K105 (Status 4). System with no deficiencies shall be reported to the closest state division of fire and life safety office within 30 days.

K105.1 System service reports shall have the following information on them:

1. Inspection company name shall be printed on all reports with address and phone number;
2. Inspector's first and last name shall be printed with State of Alaska fire systems permit number;
3. Inspector's telephone number: office and cell telephone numbers if available;
4. Deficiencies shall be typed or written and shall be printed text. No cursive or longhand handwriting is acceptable. Reports shall be written with a minimum line spacing of a 3/8 inch per line;
5. All reports shall have building name, occupancy inspected, and address clearly identified on the first page, and all subsequent pages shall have the building name and date of inspection on the top of the page;
6. All reports shall have the building contact person's name with telephone number on the front page;
7. Only white and yellow copies will be accepted by the state division of fire and life safety for reports submitted;

8. Deficiency write ups must include the code citation that is in violation and a description of the problem.

Items having minor deficiencies shall be mailed within 30 days to:

State Division of Fire and Life Safety offices

5700 E. Tudor Road, Anchorage AK 99507; Phone 907-269-5637, Fax 907-269-5018

1979 Peger Road, Fairbanks AK 99709; Phone 907-451-5200, Fax 907-451-5218

2760 Sherwood Lane, Ste.2-B, Juneau, AK 99801; Phone 907-465-4331 Fax 907-465-5521

Systems out of service and those with major deficiencies shall have a report faxed to the closest state division of fire and life safety offices and mailed immediately within one day to the address listed in this appendix.

Arizona

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems?

Yes, by reference

a. What edition of NFPA 25 is used if adopted or referenced by the state?

The 2003 International Fire Code references the 2002 Edition of NFPA 25.

b. Who enforces NFPA 25 requirements?

The State Fire Marshal Office and local AHJ

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Building owners are required to inspect the system annually. The Office of the State Fire Marshal (OSFM) requires the inspection on a 3-4 years cycle.

2. Do you have mandated tagging requirements for water based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Arizona accepts third party report systems.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Will adopt it.

Arkansas

Did not respond.

California

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

California Edition 2013 which is based on NFPA-25 2011 Edition and was developed by the California Office of the State Fire Marshal (OSFM) in cooperation with the California State Fire Marshal's Automatic Extinguishing Systems Advisory Committee.

b. Who enforces NFPA 25 requirements?

The Authority Having Jurisdiction (AHJ) enforces the requirements of NFPA 25. AHJ in California is defined as the State Fire Marshal, the chief of any city or county fire department, or fire protection district and their authorized representatives in their respective jurisdictions.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

The frequency of enforcement of NFPA 25 is up to the local AHJ or as required by NFPA 25 to contact the AHJ prior to testing and maintenance of a system.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, California has a mandated label requirement for water based fire protection systems. The standard format for labels must be approved by the Office of the State Fire Marshal.

a. What are the specific tags used?

DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL

OWNER IS RESPONSIBLE FOR MAINTAINING RECORDS

SIGNATURE

COMPANY NAME
ADDRESS
PHONE NUMBER

PRINT NAME

SPRINKLER	
STANDPIPE	
FIRE PUMP	
WATER TANK	
FOAM	
WATER SPRAY	
WATER MIST	
PRIVATE FIRE SERVICE MAIN	

LICENSE#

5 YEAR
 3 YEAR
 ANNUAL
 NEW

JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	

Figure 1 - Example of California Tag #1

DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL

FIXED SYSTEMS

RESTAURANT INDUSTRIAL
CO2 CLEAN AGENT

COMPANY NAME
STREET ADDRESS
CITY STATE ZIP CODE
PHONE NUMBER

LICENSE NO.

SIGNATURE PRINTED NAME

JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31

ANNUAL MAINTENANCE 2018
RECHARGED 2017
NEW 2016
SEMI-ANNUAL 2015
NEW 2014

Figure 2 - Example of California Fixed Systems Tag

b. How are the tagging requirements enforced?

The label requirements are enforced by the local AHJs. These local AHJs rely on the label given to the system after testing has occurred to make the determination on the operability of the system. If a system has an impairment, there is no required time frame to be corrected unless it is set by the local AHJ.

c. What reporting form is used?

A format was developed by the OSFM and shall be used to record the results of inspections, testing, and maintenance of water based fire protection systems. The completed forms shall be provided to the AHJs. In addition, some AHJs require their own forms as well.

d. Who is authorized to tag a system? Who can remove a tag from a system?

No person shall remove, deface, modify, or alter any label or tag required by Title 19, California Code of Regulations (CCR) from an automatic extinguishing system except when service is performed.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

At this time, the OSFM does not use a third party reporting system and is not aware of any jurisdictions that do.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

At this time, the state already has guidelines established. It would need to be addressed when and if NFPA developed guidance for tagging and labeling.

Colorado

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Colorado is using the 2002 edition of NFPA 25, but is currently going through a rules revision process which will adopt 2014.

b. Who enforces NFPA 25 requirements?

The local fire official

c. What is the level of frequency of enforcement of NFPA 25 provisions?

In accordance with the standard

2. Do you have mandated tagging requirements for water based fire protection systems?

No, Colorado does not have its own tagging program.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection reports are required to remain on site in accordance with fire code and available to the fire inspector upon request.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

No, the state fire marshal office believes that a tag is necessarily less detailed than the actual inspection reports provided by the inspection contractor. Requiring a tag would add a level of bureaucracy without any additional level of safety.

Connecticut

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes

- a. ***If yes, which edition is adopted?***

Currently 2002, but going to 2010 later this year.

- b. ***If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)***

Fire Marshal

- c. ***If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)***

As required by NFPA 25

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

- a. ***If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)***

Tag depends on contractors, but must contain the minimum information required by NFPA 25.

- b. ***If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?***

Partially rely on the tag, but also rely on inspection reports.

- c. ***If yes, what reporting form is used? Is there a jurisdiction specific form?***

Contractor form

- d. ***If yes, who is authorized to tag a system? Who can remove a tag from a system?***

Contractor is authorized to tag a system. Removing a tag from a system is not addressed.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Not on state level, but some individual municipalities may. They are treated as a complaint for enforcement purposes.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

No, would use it as guidance only.

Delaware

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

The 2011 edition of NFPA 25 is referenced by the current Delaware State Fire Prevention Regulations, the 2015 update to the Regulation will be adopting the later edition.

b. Who enforces NFPA 25 requirements?

The State Fire Marshal Office

c. What is the level of frequency of enforcement of NFPA 25 provisions?

The Delaware State Fire Prevention Regulations adopts the frequency from NFPA 25. In implementation, licensed contractors are required to submit an annual certificate within 30 days of conducting the annual inspection.

2. Do you have mandated tagging requirements for water based fire protection systems?

Delaware has its own tagging program.

a. What are the specific tags used?

The tags are provided by the individual licensed contractors and the tags include name, address, phone, and License # on each tag. Office of the State Fire Marshal does not issue or provide tags. It is done by the servicing contractor and the Office of the State Fire Marshal does not dictate what color is used.

b. How are the tagging requirements enforced?

Tags are not an indicator of impairment, they are an indicator of an inspection. Impairments, like other major deficiencies, must be reported by the contractor to the Office of the State Fire Marshal within 24 hours of discovery.

c. *What reporting form is used?*

Certificates of inspections are required throughout the entire State including the four city jurisdictions. The certificate includes a section to list all major deficiencies, including impairments. It is this form that the contractor must submit within 24 hours if there is a major deficiency via fax. Certificates with no major deficiencies must be submitted within 30 days.

d. *Who is authorized to tag a system? Who can remove a tag from a system?*

The contractor is authorized to tag a system, but the tag is not used to denote an impairment, it denotes an inspection.

3. *If you have no tagging requirements, what method of enforcement/reporting is being used?*

Delaware has its own tagging program.

4. *Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)*

Delaware does not use a third party reporting system because they do not feel the services provided by a third party are adequate.

5. *If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?*

Delaware would possibly adopt the change, but it would have to provide a compelling reason above what the present system provides.

Florida

1. *Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?*

Yes

a. *What edition of NFPA 25 is used if adopted or referenced by the state?*

Florida was scheduled to adopt the 2011 edition of NFPA 25 on December 31, 2014.

b. *Who enforces NFPA 25 requirements?*

The requirements of NFPA 25 are enforced at the local level by the fire AHJ.

c. *What is the level of frequency of enforcement of NFPA 25 provisions?*

The frequency of enforcement is as required by NFPA 25. However, it appears that most fire protection system contractors have entered into agreements with the property owner to provide annual inspection, testing, and maintenance (ITM). While NFPA 25

suggests (requires) inspection frequency as often as weekly/monthly, it is observed that this work is not performed by licensed contractors.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, Florida uses the Florida Administrative Code 69A-46 (part of the “Fire Marshal’s Rules”) FIRE PROTECTION SYSTEM CONTRACTORS AND SYSTEMS.

a. What are the specific tags used?

The code requires “contractors” to attach a “tag” to the system riser after the completion of an inspection or testing of the system. A green (compliance) or a red (noncompliance) tag is used. The inspection tag shall be 5-¼” to 7” X 3-½” to 4” durable and weather resistant material placed attached to the riser containing the following information:

- “DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL.” This particular information shall be in a minimum of 10 point type and in all capital letters;
- The licensed Fire Protection System Contractor I or II’s name and licensed physical address;
- The license number of the Fire Protection System Contractor I or II;
- The permit number of the Water-Based Fire Protection Inspector;
- The permitted Water-Based Fire Protection Inspector’s signature;
- The day, month, and year (to be punched); and
- The facility name and address.

b. How are the tagging requirements enforced?

The State Fire Marshal adopts and enforces the State minimum fire prevention code; each local fire AHJ is required by Florida Statute to enforce the Florida Fire Prevention Code and Rules of the State Fire Marshal in their jurisdiction. Fire Protection Contractors are licensed and regulated through the Division of State Fire Marshal.

d. Who is authorized to tag a system? Who can remove a tag from a system?

A Fire Protection Contractor, contracted to perform inspecting, testing, and maintenance service on a fire protection system

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Florida has its own tagging requirements.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Some jurisdictions in Florida adopted third party reporting systems, but it is presently not a State requirement, and the application is not standardized. There is “talk” about a “required”

Statewide system; however, this is in the developmental and early phases. If it comes to fruition, it will require rule making and adoption.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Possibly, Florida presently has an adopted rule, as previously addressed, and if NFPA 25 develops a standard it would be reviewed during and compared to the existing administrative code requirements. Certainly, a NFPA “best practices” program would carry significant weight in the discussion. Any changes to the existing rule would involve the rule making process, including public input.

Georgia

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Georgia adopted the 2011 edition of NFPA 25 in their minimum fire safety standards (RULES AND REGULATIONS OF THE SAFETY FIRE COMMISSIONER CHAPTER 120-3-3 RULES AND REGULATIONS FOR THE STATE MINIMUM FIRE SAFETY STANDARDS).

b. Who enforces NFPA 25 requirements?

While the State of Georgia establishes these standards, enforcement of these standards is passed down to many local jurisdictions in most of the heavily populated areas of the state. The State Fire Marshal Office acts as the enforcement body in locations throughout the state where the tax base cannot support an independently operating Fire Marshal’s Office, or in facilities that remain, by legislative statute, under the direct jurisdiction of the State Fire Marshal’s Office.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Georgia has its specific tagging requirements for sprinkler systems when they are both initially commissioned and when they are annually inspected (RULES AND REGULATIONS OF THE SAFETY FIRE COMMISSIONER CHAPTER 120-3-3 RULES AND REGULATIONS FOR THE STATE MINIMUM FIRE SAFETY STANDARDS).

a. What are the specific tags used?

The Georgia minimum fire safety standards outline the specific requirements for the “Green,” “Yellow,” and “Red” tagging of sprinkler systems based on their level of functionality that have been revealed during an annual inspection.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Georgia has its own tagging requirements.

Hawaii

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

- a. If yes, which edition is adopted?
- b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)
- c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

No, the State of Hawaii and each county (Hawaii, Honolulu, Kauai, and Maui) do not specifically adopt NFPA 25. Instead, **the State of Hawaii has adopted the 2012 NFPA 1 which references the inspection, testing, and maintenance (ITM) requirements found in NFPA 25.** Each county has 18 months to adopt the State of Hawaii fire code with amendments. The 2012 edition of NFPA 1 allows the counties to utilize NFPA 25 requirements as code.

Each county fire department is responsible for enforcing ITM requirements per NFPA 25 requirements by having the building owner responsible for ensuring an ITM is completed at the required frequency. Reports of the maintenance verifying this shall be kept on file by building owners and system testing vendor for review by the AHJ.

2. Do you have mandated tagging requirements for water-based fire protection systems?

- a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)
- b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?
- c. If yes, what reporting form is used? Is there a jurisdiction specific form?
- d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

The State of Hawaii does not have a state-wide tagging requirement. Hawaii, Kauai, and Maui follow the "Honolulu" model's tagging requirements (per NFPA 25). Taking water-based fire extinguishing systems an example, please find Honolulu's requirements below:

Class I class II, class III, and combined standpipe fire extinguishing systems passing a five year inspection (annual inspection for class II hoses) shall have an approved, weatherproof, inspection decal affixed to the fire department connection. If the system does not have a fire department connection, decals shall be affixed to hose cabinets located on the ground floor and the top-most floor.

The decal shall indicate the type of system, the month and year the system was tested, the license number of the licensee conducting the test and the inspection company's name.

The decal shall be yellow, at least 2 ¼-inches in width and 3 ¼-inches in length, and clearly visible without obstructing the operation of the fixed fire extinguishing system.

The decal shall be constructed of a durable material approved by the AHJ.

The decal shall be punched with no more than one year and one month.

A collar tag is a circular, solid plastic collar with at least a 3-inch diameter hole in the center and shall slide onto each hose length approximately midway from the male and female couplings after the physical inspection has been completed and deemed satisfactory. The verification collar shall indicate the month and year the hose was inspected, the license number of the licensee conducting the test, and the inspection company's name. Verification collars may be constructed of other suitable materials when approved by the AHJ.

The verification collar shall be punched with no more than one year and one month.

Inspection companies with older decals, tags, and collars shall have one year from the date of the adoption of this chapter to comply with the approved inspection decal, tag and collar format.

The State of Hawaii is currently working on requirements for tagging as part of administrative rules for companies that do ITM. A new tag is only attached if the system has passed servicing/inspection. A report, which is currently not standardized state-wide, is requested to verify the operability of the system. If a system is "unsatisfactory", corrections are required immediately. Generally the county fire departments provide time to do corrections. However, the owner of the system is reminded of their liability of having an "unsatisfactory" system. A fire-watch may be required depending on the correction required or the status of operability of the respective system. As far as removal of a tag, there are no rules in place at this time, but a system does look very questionable if it does not have a tag.

3. *If you have no tagging requirements, what method of enforcement/reporting is being used?*

Honolulu county has a system tagging requirement that will be the model for the entire State through a system testing administrative rule that is going through the process. The other counties use the "Honolulu" system but will welcome a state mandated program. State code requires fire protection servicing companies to route all reports for servicing to the respective AHJs. Each county has different policies, but for the most part the counties request the "unsatisfactory" reports for follow up. The state-wide program will mitigate this current issue.

4. *Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)*

There is no third party reporting system for the state or counties. Maui County, however, knows of one Fire Protection Company that uses Building Reports for documenting the systems they service. This company provided Maui fire with a username and password to access their reports.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

The Hawaii State Fire council and the county fire departments would be willing to review an annex guidance for a tagging program. The State Fire Council is currently pushing for a state-wide administrative rule to address the ITM licensing program of companies that do ITM. The Hawaii State Fire Council is striving to provide consistency and assurances that companies/individuals performing ITM on any fire protection of life safety systems are qualified to national standards such as the NFPA standards on fire alarm systems, fire extinguishers, and water and non-water based fire extinguishing system.

Idaho

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2014 Edition of NFPA 25 by reference

b. Who enforces NFPA 25 requirements?

OSFM and local AHJs

c. What is the level of frequency of enforcement of NFPA 25 provisions?

According to NFPA 25

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection reports and documents that vendors submit

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Yes

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Would need more information before making a decision

Illinois

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

The Office of the Illinois State Fire Marshal has adopted rules to regulate fire sprinkler contractors on a statewide basis. Those rules require compliance with the most recent edition of NFPA 25 in effect at the time of a system installation. (Although titled the “Fire Sprinkler Contractor Licensing Rules,” the rules are applicable to water-based suppression systems, fire pumps, standpipes, and other components relevant to the ITM programs defined in NFPA 25).

b. Who enforces NFPA 25 requirements?

NFPA 25 is enforced by the Office of the State Fire Marshal (OSFM) as well as local enforcement officials from municipal fire and building departments and fire protection districts. By virtue of the adoption by reference of NFPA 25 into state administrative rules, local AHJs are allowed to enforce the standard without separately making a formal adoption in their own community.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

The rules of the OSFM require compliance with NFPA and therefore, this is taken to mean all defined Inspecting, Testing, and Maintenance (ITM) requirements of NFPA 25. However, the OSFM Division of Fire Prevention is certainly not conducting either Life Safety Code or water-based fire protection system inspections in each and every occupancy across the state. For the occupancies that are inspected by the OSFM Division of Fire Prevention (typically state-licensed facilities such as day care centers, day care homes, residential board and care homes, as well as state-owned facilities such as, correctional centers), OSFM inspectors are collecting the latest sprinkler system ITM reports, which typically address an annual test of the system. Although there is no comprehensive data, practical experience is that local AHJs that are able to inspect a greater percentage of the occupancies in their jurisdictions, are not demanding evidence of compliance with every quarterly or semi-annual inspection or test required by NFPA 25. Rather, they are requiring evidence of annual ITM compliance.

2. Do you have mandated tagging requirements for water-based fire protection systems?

The State of Illinois does not implement their own tagging requirements for water-based systems. Illinois rules applicable to non-water-based systems (e.g., halon, clean-agent, CO₂ and dry chemical suppression systems, etc.) do have a defined state-tagging system but this does not extend to water-based systems.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Local fire departments across Illinois can choose their own methods and procedures regarding building/system owners providing evidence of compliance with inspection, testing and maintenance requirements of NFPA 25. Speaking for the OSFM Division of Fire Prevention, enforcement is accomplished via the collection (hard copy) of a system inspection report supplied by an Illinois OSFM-licensed fire sprinkler contractor on behalf of the occupancy owner. But again,

the Illinois OSFM is not conducting inspections in all Illinois occupancies/buildings. The inspection personnel are mainly concentrating their efforts in state-licensed and state-owned facilities.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

OSFM does not use a third party reporting system for the collection of NFPA 25 ITM reports. Local Illinois fire departments are allowed to have their own requirements for the collection of this data, and some have indeed moved the task to third party reporting systems. However, there is not one state-standard for this process and it varies from community to community.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

In general yes – the OSFM supports a tagging program similar to what they have already established for their non-water-based fire protection system ITM programs (whereby a licensed contractor must tag systems as being appropriately inspected and tested). However, this with the caveat that such a requirement would need to be moved through Illinois’ rulemaking process that involves a committee of the legislature. Therefore, the OSFM cannot guarantee acceptance or mandatory compliance with such a program simply by virtue of its appearance in a future edition of NFPA 25 (and it could possibly be even more problematic to enforce if the language was restricted only to the Annex of the standard, because as we know, Annex language is not “code” and not “enforceable as code”).

Indiana

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes. Refer: <http://www.in.gov/dhs/2490.htm>

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011

b. Who enforces NFPA 25 requirements?

c. What is the level of frequency of enforcement of NFPA 25 provisions?

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Annual inspection reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

Probably not

Iowa

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes, by reference

- a. ***What edition of NFPA 25 is used if adopted or referenced by the state?***

At the State of Iowa level, they adopt NFPA 25 by reference from the 2009 International Fire Code. Tagging of impaired systems is covered in the IFC sec. 901.7.

- b. ***Who enforces NFPA 25 requirements?***

In most instances the tag impairment process is handled by the Licensed Fire Sprinkler Company and the Building Owner/Impairment Coordinator unless the building owner assigns someone to handle the role of Impairment Coordinator.

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

No formal tagging requirement or form for licensed sprinkler contractors or local Fire Chiefs/Inspectors

3. ***If you have no tagging requirements, what method of enforcement/reporting is being used?***

In section 901.7, reporting of a system out of service is required to go to the Fire Department and the Fire Code Official. There are licensed Sprinkler and Suppression Contractors in Iowa who make it part of their normal process to report system out of service for maintenance and testing.

4. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

There is no third party oversight of tagging. The building owner is required to keep on file all testing and maintenance information for the inspector to verify when an inspection is performed.

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

If the Annex of NFPA 25 were provided, it would be very helpful as a reference on what a tag should have as pertinent information for the owner, occupants, contractor, and AHJ.

Kansas

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Office of the Kansas State Fire Marshal has adopted NFPA 25 – 2008 Edition.

b. Who enforces NFPA 25 requirements?

OSFM will enforce it.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Kansas does not have their own tagging requirements.

Kentucky

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Kentucky adopts the 2011 Edition of NFPA 25.

b. Who enforces NFPA 25 requirements?

Enforced by Fire Official

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Kentucky follows the quarterly requirements for health care and annually for all others.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Kentucky does not implement their own tagging requirements.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection Reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Would review it.

Louisiana

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

Louisiana is currently enforcing the 2011 Edition of NFPA 25.

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

Fire and building officials

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

Annually

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes

a. If yes, what are the specific tags used? What is not included?

TAG REQUIREMENTS

Reference: [Tag Requirements for License Renewal](#)

CERTIFICATION TAG (GREEN)



(Click on reference link for larger view)

1. Certification tags shall be green in color. Tags on portable fire extinguishers may be any color except blue, yellow or red.
2. All tags must be card stock, plastic, vinyl, tyvek or metal in order to maintain the running record for the system.
3. All tags shall be 5¼ inches in height and 2½ inches in width.
4. Firms shall have their tags printed and one forwarded to the State Fire Marshal's Licensing Section for approval and incorporation in the firm's life.
5. Tags may be removed only by licensed employees of a certified firm or employees of the State Fire Marshal's Office and certified fire prevention bureaus.
6. The certification tag shall be attached in such a way as to not hamper the actuation and operation of the equipment or system.
7. A certification tag shall be attached on all systems or equipment found to be in proper working condition and which are found to be in an operational condition per the inspection, testing and

maintenance chapters of the applicable NFPA codes and standards. This tag shall be used for new installations and shall be in addition to the installation tag provided for in these rules.

8. Certification tags must contain all of the information listed below. Information shall be preprinted on the tag unless noted otherwise.
 - a. "DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL" (all capital letters in bold face type);
 - b. firm's name, physical address and telephone number;
 - c. firm's State Fire Marshal certificate number;
 - d. technician's name and State Fire Marshal license number to be printed on tag either at the time of service or preprinted;
 - e. technician's signature to be signed at time of service (no preprinted signatures nor initials are permitted; apprentices are not permitted to sign tags);
 - f. day, month and year in which the certification was performed (must be punched through certification tag at designated marks for day, month and year; designated marks for day, month and year shall only be punched once per tag);
 - g. type of work performed. Only installation or certification shall be noted on tag for type of work performed (must be punched through the certification tag).
 - h. serial number of special locking system's control panel if present;
 - i. owner of system and address of owner (to be noted on rear of tag).
9. Other information may be permitted on the tag after a review and approval by the fire marshal. A request for additional information shall be made to the fire marshal in writing with a sample tag indicating the requested additions.

SERVICE TAG (BLUE)



(Click on reference link for larger view)

1. Service tags shall be blue in color.
2. All tags must be card stock, plastic, vinyl, tyvek or metal in order to maintain the running record for the system.
3. All tags shall be 5¼ inches in height and 2½ inches in width.
4. Firms shall have their tags printed and one forwarded to the State Fire Marshal's Licensing Section for approval and incorporation in the firm's life.
5. The service tag shall be attached in such a way as to not hamper the actuation and operation of the equipment or system.
6. Tags may be removed only by licensed employees of a certified firm or employees of the State Fire Marshal's Office and certified fire prevention bureaus.
7. Service tags must contain all of the information listed below. Information shall be preprinted on the tag unless noted otherwise.
 - a. "DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL" (all capital letters in bold face type);
 - b. firm's name, physical address and telephone number;

- c. firm's State Fire Marshal certificate number;
 - d. technician's name and State Fire Marshal license number to be printed on tag either at the time of service or preprinted;
 - e. technician's signature to be signed at time of service (no preprinted signatures nor initials are permitted; apprentices are not permitted to sign tags);
 - f. day, month and year in which service was performed (must be punched through service tag at designated marks for day, month and year; designated marks for day, month and year shall only be punched once per tag);
 - g. type of work performed. Only Service shall be noted on tag for type of work performed. Specifics as to the type of work performed shall be noted on rear of tag, (i.e. changed push button, repaired motion detector, etc).
 - h. Serial number of special locking system's control panel if present.
 - i. Owner of system and address of owner (to be noted on rear of tag).
8. Other information may be permitted on the tag after a review and approval by the fire marshal. A request for additional information shall be made to the fire marshal in writing with a sample tag indicating the requested additions.

PARTIAL IMPAIRMENT TAG (YELLOW)



(Click on reference link for larger view)

1. A partial impairment tag, to be yellow in color, which is to be used when minor deficiencies are found on the equipment or system. The partial impairment tag is in addition to the requirement of having a service tag and impairment tag.
2. All tags must be card stock, plastic, vinyl, tyvek or metal in order to maintain the running record for the system.
3. All tags shall be 5¼ inches in height and 2¾ inches in width.
4. Firms shall have their tags printed and one forwarded to the State Fire Marshal's Licensing Section for approval and incorporation in the firm's life.
5. Tags may be removed only by licensed employees of a certified firm or employees of the State Fire Marshal's Office and certified fire prevention bureaus.
6. Partial impairment tags must contain all of the information listed below. Information shall be preprinted on the tag unless noted otherwise:
 - a. "DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL" (all capital letters in bold face type);
 - b. firm's name, physical address and telephone number;
 - c. firm's State Fire Marshal certificate number;
 - d. technician's name and State Fire Marshal license number to be printed on tag either at the time of service or preprinted;
 - e. technician's signature to be signed at time of inspection (no preprinted signatures nor initials are permitted; (apprentices are not permitted to sign tags);

- f. day, month and year in which the impairment was found (to be punched through service tag at designated marks for day, month and year; designated marks for day, month and year shall only be punched once per tag);
- g. type of impairment found (to be hand written on rear of tag);if additional space is needed to note the impairments, then multiple tags shall be used noting 1 of 2, 2 of 2, etc.;
- h. serial number of special locking system's control panel if present;
- i. business owner or tenant and physical address of where the system is located (to be noted on rear of tag).

IMPAIRMENT TAG (RED)



(Click on reference link for larger view)

1. All firms shall have an impairment tag, to be red in color, which is to be used when major deficiencies are found on systems or equipment.
2. All tags must be card stock, plastic, vinyl, tyvek or metal in order to maintain the running record for the system.
3. All tags shall be 5¼ inches in height and 2½ inches in width.
4. Firms shall have their tags printed and one forwarded to the State Fire Marshal's Licensing Section for approval and incorporation in the firm's life.
5. Tags may be removed only by licensed employees of a certified firm or employees of the State Fire Marshal's Office and certified fire prevention bureaus.
6. Impairment tags must contain all of the information listed below. Information shall be preprinted on the tag unless noted otherwise:
 - a. "DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL" (all capital letters in bold face type);
 - b. firm's name, physical address and telephone number;
 - c. firm's State Fire Marshal certificate number;
 - d. technician's name and State Fire Marshal license number to be printed on tag either at the time of service or preprinted;
 - e. technician's signature to be signed at time of inspection (no preprinted signatures nor initials are permitted; (apprentices are not permitted to sign tags);
 - f. day, month and year in which the inspection was performed (to be punched through service tag at designated marks for day, month and year; designated marks for day, month and year shall only be punched once per tag);
 - g. type of impairment found (to be hand written on rear of tag);if additional space is needed to note the impairments, then multiple tags shall be used noting 1 of 2, 2 of 2, etc.;
 - h. serial number of special locking system's control panel if present;
 - i. business owner or tenant and physical address of where the system is located (to be noted on rear of tag).

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Firms are required to fax an impairment form to the OSFM within 48 hours of placing an impairment tag on a life safety system.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Louisiana currently does not use a third part reporting system.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

The state would be open to any suggestions.

Maine

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

The 2008 edition is currently adopted, but in the process of adopting 2014.

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

State Fire Marshal's Office

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

Frequencies as required by NFPA 25

2. Do you have mandated tagging requirements for water-based fire protection systems?

No required tagging, but recommended

d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

License fire sprinkler inspector or fire official

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Reports are required to be supplied upon request with notification of critical deficiencies only.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

No, Annex material is not recognized as part of the Standard.

Maryland

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes, by reference.

- a. ***What edition of NFPA 25 is used if adopted or referenced by the state?***

The office enforces the 2011 adoption of NFPA 25 as referenced by the 2012 edition of NFPA 1. Maryland is in the process of reviewing the 2015 edition of NFPA 1 for anticipated adoption of January 1, 2016. At that time the reference to NFPA 25 would automatically updated.

- b. ***Who enforces NFPA 25 requirements?***

The fire code official (Fire Marshal) would be the enforcing authority for the fire protection matters.

- c. ***What is the level of frequency of enforcement of NFPA 25 provisions?***

The frequency of enforcement for the provisions of NFPA 25 would correlate with the frequency of inspection and would vary with several factors including the need for a permit or license, the age and occupancy of the structure, and other special circumstances such as complaints. The frequency of testing required for the fire protection equipment would comply with the provisions of NFPA 25.

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

Currently do not have a mandatory tagging system

3. ***If you have no tagging requirements, what method of enforcement/reporting is being used?***

The enforcement is completed either by observing the tag or by review of written documentation on file with the owner.

4. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

It is unlikely that a tagging program would be required, even with guidance from NFPA 25 Annex materials.

Massachusetts

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Massachusetts adopted the 2011 Edition of NFPA 25.

b. Who enforces NFPA 25 requirements?

Enforced by the Head of the Local Fire Department or the State Fire Marshal or designees.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

2. Do you have mandated tagging requirements for water-based fire protection systems?

Massachusetts does not implement their own tagging requirements.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

The Massachusetts regulation requires, if requested by the AHJ, a one page summary report to be sent to them.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Not in Massachusetts

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Maybe

Michigan

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

The Bureau of Fire Services does adopt NFPA 25 for use with the statewide facilities that our Bureau regulates. The Bureau has Fire Safety Rules that adopt NFPA 101 and therefore NFPA 25 by reference. We regulate: hospitals, nursing homes, homes for the aged, adult foster care, penal institutions, schools, colleges, universities, dormitories and free-standing surgical out-patient facilities.

a. If yes, which edition is adopted?

The edition of NFPA 25 is based off of the specific Fire Safety Rules per facility. Currently we have three different editions. Health Care adopts NFPA 25, 2011. Schools, colleges, universities, dorms and penal facilities adopt NFPA 25, 1995. Adult foster care facilities adopt NFPA 25, 2002.

- b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)**

The Bureau of Fire Services is not the only authority having jurisdiction for these types of facilities. Usually the local AHJ is the one who enforces NFPA 25. However, our Bureau does do inspections for health care facilities so we do enforce NFPA 25 for those facilities.

- c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)**

The Bureau inspects hospitals and homes for the aged on an annual basis.

- 2. Do you have mandated tagging requirements for water-based fire protection systems?**

The Bureau of Fire Services **does not** have a mandated tagging program. The newer edition of NFPA 101, 2012 was just adopted in December 2014. They have not started a tagging program at this time.

- 3. If you have no tagging requirements, what method of enforcement/reporting is being used?**

The Bureau does annual inspections for health care facilities and check to make sure that the sprinkler systems have been maintained.

- 4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)**

BFS does not use a third party reporting system.

- 5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?**

BFS adopts the Life Safety Code and the referenced NFPA documents from chapter 2 so they have always referred to NFPA 25. The referenced documents/standards are not adopted individually. Information in the Annex sections is used for reference only.

Minnesota

- 1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?**

Yes

- a. What edition of NFPA 25 is used if adopted or referenced by the state?**

Minnesota adopted the 2008 edition. Early 2015, State will adopt the 2011 edition.

- b. Who enforces NFPA 25 requirements?**

The local fire code official or Deputy State Fire Marshal in buildings are required to inspect by state statute.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

The current fire code requires annual inspections. The new code next year will have language stating, "The annual test shall include all the inspections, tests and maintenance requirements in the listed standards including weekly, monthly, quarterly, semiannually and annually and shall note any problems observed."

2. Do you have mandated tagging requirements for water-based fire protection systems?

No mandated tagging requirements in the state fire code. Local jurisdictions may have their own requirements.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Section 901.6.2, of the 2006 edition of the International Fire Code (2007 Minnesota State Fire Code) requires inspection records to be maintained on site for a minimum of three (3) years and copied to the fire code official upon request.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

This would be up to the AHJ.

Mississippi

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

- a. If yes, which edition is adopted?
- b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)
- c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

No, the State of Mississippi is a by jurisdiction state. All local jurisdictions have the authority to adopt codes and standards as they see fit.

2. Do you have mandated tagging requirements for water-based fire protection systems?

- a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)
- b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?
- c. If yes, what reporting form is used? Is there a jurisdiction specific form?
- d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

No. The State of Mississippi requires inspections as set forth in the 2012 International Fire Code.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

As required by the local jurisdiction

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

The Mississippi Insurance Department provides all fire departments in the state with the Mississippi Firebridge, an Imagetrend product, for reporting and inspections.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

There is a possibility that this could be used to adopt a tagging program that would apply statewide.

Missouri

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

No state wide adopted code.

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Up to the local AHJ

b. Who enforces NFPA 25 requirements?

Up to the local AHJ

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Up to the local AHJ

2. Do you have mandated tagging requirements for water-based fire protection systems?

No, up to the local AHJ

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Up to the local AHJ

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Some local jurisdictions use third party systems, but they are not used state wide.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Will see, would like to see what is added by NFPA 25, if it is consistent to the practice, adoption is possible.

Montana

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes, by reference

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011 edition of NFPA is used when referenced by the 2012 IFC.

b. Who enforces NFPA 25 requirements?

Enforced by all fire inspectors

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Level of frequency is as stated in NFPA 25.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Possibly at next code change

Nebraska

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2002 Edition is adopted.

b. Who enforces NFPA 25 requirements?

Office of State Fire Marshal

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Annually

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes

a. What are the specific tags used?

b. How are the tagging requirements enforced?

Enforcement depends on the tags. Deficiencies list should be sent to the OSFM.

c. What reporting form is used?

Forms on the website: <http://www.sfm.nebraska.gov/forms/sprinkler.html>

d. Who is authorized to tag a system? Who can remove a tag from a system?

Inspector

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Yes, if it is backed by NFPA

Nevada

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011 Edition is adopted.

b. Who enforces NFPA 25 requirements?

AHJ is responsible for the enforcement.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

The level of frequency is per the AHJ's own enforcement. The OSFM does not specify frequency of enforcement to the AHJ, they could all be different per their own regulations (more stringent).

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, which is regulated by the Nevada Administrative Code 477.470.

a. What are the specific tags used?

Only Nevada State Fire Marshal approved tags are used in this state. All licensing of companies and individuals that install or maintain any fire suppression system is done by the Nevada State Fire Marshal, Licensing Office.

b. How are the tagging requirements enforced?

The system is enforced through state fire marshal office and the local AHJ's.

3. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

No

4. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

Currently no, but that is up to the State Fire Marshal to make changes if necessary.

New Hampshire

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes

- a. ***What edition of NFPA 25 is used if adopted or referenced by the state?***

The 2008 edition of NFPA 25 has been adopted.

- b. ***Who enforces NFPA 25 requirements?***

The State Fire Marshal in state owned buildings and local fire officials in all other cases.

- c. ***What is the level of frequency of enforcement of NFPA 25 provisions?***

At the state level, it is once a year through a self-inspection program with spot checks. Local levels can determine their own frequency.

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

No

3. ***If you have no tagging requirements, what method of enforcement/reporting is being used?***

Request for inspection/testing reports

4. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

They would review to see what value would be added and what the fiscal impact would be.

New Jersey

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2002 Edition of NFPA 25 by reference

b. Who enforces NFPA 25 requirements?

Local Fire Official

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Depends on the occupancy

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Records or inspection reports on site

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Will see, but have to go through legislation process.

New Mexico

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Their current code adoption is 2003 edition of the International Fire Code (IFC). It references NFPA 25, 1998 edition.

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Standard reporting

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

We will adopt and use the IFC. We are currently in the process to adopting IFC, 2015 edition.

New York

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water Based Fire Protection Systems?***

Yes

- a. ***If yes, which edition is adopted?***

2008

- b. ***If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)***

Any Code Enforcement Official certified in NYS

- c. ***If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)***

The Code Enforcement Officials in NYS are required to enforce as required by the standard.

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

This would be up to the local jurisdictions. This is not a State requirement.

3. ***If you have no tagging requirements, what method of enforcement/reporting is being used?***

They have reviewed the inspection reports that the building owner has received from the 3rd party inspection company.

4. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

This would be up to the local jurisdiction.

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

NYS would like a program like this as long as the tagging program indicated deficiencies that were found during the required inspections.

North Carolina

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?***

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

The 2008 edition of NFPA 25 has been adopted state-wide.

b. Who enforces NFPA 25 requirements?

The owner maintains the system in accordance with NFPA 25, similar to the requirements in the International Fire Code. The fire inspector will perform an inspection to confirm the maintenance has been kept in accordance with the following schedule.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Once every year for hazardous, institutional, high-rise assembly except those noted below, and residential except one- and two family dwellings and only interior common areas of dwelling units of multi-family occupancies. Once every two years for industrial and educational (except public schools). Once every three years for assembly occupancies with an occupant load less than 100, business, mercantile, storage, churches, synagogues, and miscellaneous Group U occupancies.

2. Do you have mandated tagging requirements for water-based fire protection systems?

The state does not implement any additional tagging requirements; however, the General Statutes allow local jurisdictions to adopt a more stringent criteria if necessary.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Depends on local jurisdiction

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Depends on local jurisdiction

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Depends on local jurisdiction

North Dakota

Did not respond.

Ohio

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes, by reference

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Ohio is using the 2011 Edition of the Ohio Fire Code which references the 2008 Edition of NFPA 25.

b. Who enforces NFPA 25 requirements?

Office of the State Fire Marshal

c. What is the level of frequency of enforcement of NFPA 25 provisions?

It requires that an annual inspection tag be attached or placed near or on the main control valve of the sprinkler system

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, Ohio has its own tagging requirements regulated by the Ohio Fire Code.

a. What are the specific tags used?

A tag is to be attached or placed near or on the main control valve of the sprinkler system.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Ohio has its own tagging requirements regulated by the Ohio Fire Code.

Oklahoma

The Oklahoma, Department of Labor incorporates by reference NFPA 25 as adopted by the Oklahoma Uniform Building Code Commission (OUBCC). This is from the section 380:75-1-3 of the following document.

Reference:

<http://www.ok.gov/odol/documents/Alarm%20and%20Locksmith%20Industry%20Act%20and%20Rules%202011%201%202014.pdf>

Oklahoma has their own Fire Sprinkler tagging requirements, section 380:75-5-2. They use white, bright green, bright yellow, bright red inspection tags for this purpose. More details on the same can be obtained from the above link to the document.

Oregon

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

2011 edition of NFPA 25

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

Fire code officials throughout the State of Oregon

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

They follow it as outlined in NFPA 25.

2. Do you have mandated tagging requirements for water-based fire protection systems?

No tagging requirements

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

They require that each company have their own forms or use form similar to NFSA's forms. They and others have forms that companies can buy and download addressing the inspection, testing and maintenance as outlined in NFPA 25.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

At the State level they do not use a third part reporting system. A number of city and county jurisdictions are in the process of implementing such a program. They are monitoring the results.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Yes, they would adopt a tagging program.

Pennsylvania

The Pennsylvania Department of Labor and Industry (L&I) does not in enforce or adopt NFPA 25. L&I has adopted the International Building Code 2009 Edition (IBC). A referenced standard in the IBC is the International Fire Code, 2009 Edition (IFC). A referenced standard in the IFC is NFPA 25. The Pennsylvania Building Code, referred to as the Uniform Construction Code (UCC), is enforced by opt-in municipalities and the L&I. L&I enforces the UCC for state owned and state related buildings. L&I also enforces the UCC for commercial buildings for a minority of Pennsylvania municipalities that have opted out of enforcement. Only the installation of such equipment would be covered. There are no property maintenance provisions. There are no enforcement or tagging activities.

If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

No, they would not be likely to adopt. It is only a referenced standard. They only have statutory authority to adopt the ICC codes.

Rhode Island

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes, Rhode Island currently has adopted the 2011 edition of NFPA 25 through reference from the 2012 editions of NFPA 1 and NFPA 101.

The State Fire Marshal is responsible for all enforcement of the fire code and he/she is authorized to delegate this enforcement to Assistant Deputy State Fire Marshals who are in the local communities.

Building Owners would be expected to comply with all of the inspection and testing frequencies found in NFPA 25. Fire Inspectors check the paperwork for such inspection and testing during site inspections, which have varied frequency based on occupancy type.

2. Do you have mandated tagging requirements for water-based fire protection systems?

No, Rhode Island does not have a mandated tagging system in place; however, they have started the code adoption process for the 2015 editions of NFPA 1 and NFPA 101 and the State Fire Marshal has requested that a mandatory sprinkler tagging system be put into place. They currently use a mandated tagging system for all fire alarm system testing and maintenance which has been in place since 2005 and worked very well.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Enforcement is as detailed in number one. If a site visit occurs, the inspection/testing records are reviewed on site. If a site visit does not occur, reporting would be dependent on the testing firm submitting test forms to the local fire marshals. In smaller communities these forms may be able to be tracked. In larger communities, tracking the forms that are submitted would be unmanageable.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)?

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Rhode Island will likely have a program in place before NFPA 25 adopts one. If they use a system similar to the current fire alarm program they have in place, the State will have the forms/tags printed and they will sell them to the inspection companies. There would be a significant investment to start this, unless there were substantial changes and the Rhode Island system was severely lacking, they do not believe to change an existing program. If there was a change it would likely occur when forms/tags are re-printed.

South Carolina

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011 edition of NFPA 25 by reference

b. Who enforces NFPA 25 requirements?

Local AHJs

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Up to local AHJs

2. Do you have mandated tagging requirements for water-based fire protection systems?

No, not at the state level. But local AHJs may have their tagging program.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Up to local AHJs

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Yes accept

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Might not adopt

South Dakota

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes, adopted

a. What edition of NFPA 25 is used if adopted or referenced by the state?

The 2011 edition of NFPA 25 has been adopted.

b. Who enforces NFPA 25 requirements?

OSFM and local AHJ

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Up to local AHJ

2. Do you have mandated tagging requirements for water-based fire protection systems?

Not at the state level, up to the local AHJ

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Up to the local building or fire official

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, or Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program/ or change your existing program to match it?

Depends on local jurisdiction

Tennessee

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

2002 edition of NFPA 25 is adopted by reference.

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

For the Codes Enforcement Section of the Tennessee State Fire Marshal's Office it is the Deputy State Fire Marshal assigned to the area. If project does not fall under state jurisdiction, it would be the local jurisdictions responsibility.

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

The Rules (see Link below) require inspections to be conducted by a licensed sprinkler contractor in accordance with the standards, i.e., NFPA 25.

2. Do you have mandated tagging requirements for water-based fire protection systems?

a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)

Please see section 0780-02-07-.10 of the following link for the requirements, <http://www.tn.gov/sos/rules/0780/0780-02/0780-02-07.20090714.pdf>

b. If yes, how are the tagging requirements enforced?

See link above, Rule 0780-02-07-.12.

Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system?

Yes

For systems tagged as having an impairment, do you have a required time frame to fix the problem?

If a system is out of service the owner is required to have a fire watch until the system is placed back in service, time frames may vary based on the nature of the problem.

c. If yes, what reporting form is used? Is there a jurisdiction specific form?

Sprinkler contractor use their own forms based on NFPA 25.

d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

See link above, Rule 0780-02-07-.10.

- 4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)**

No

- 5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?**

Annexes are used for guidance only, not enforcement.

Texas

- 1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?**

Yes

- a. What edition of NFPA 25 is used if adopted or referenced by the state?**

Texas just adopted 2014 edition of NFPA 25.

- b. Who enforces NFPA 25 requirements?**

Enforced by the Licensing section of the State Fire Marshal's Office

- c. What is the level of frequency of enforcement of NFPA 25 provisions?**

As required by NFPA 25

- 2. Do you have mandated tagging requirements for water-based fire protection systems?**

Yes, Texas has its own tagging requirements.

- a. What are the specific tags used?**

Original Installation Tag (white) - can be attached by any authorized service person (employee) of the registered firm (fitter, job foreman, Responsible Managing Employees (RMEs), etc.). Requires license # and signature of RME-G (General License) or D (Dwelling) (not RME-U (Underground)).

ITM Tag (blue) – is also required on a new installation (in addition to the OIT) and must be signed by RME-I (General Inspector) or RME-G (not RME-U).

Service Tag (white) = any authorized employee of registered firm.

Noncompliant Tag (yellow) = any authorized employee of registered firm.

Impaired Tag (red) = any authorized employee of registered firm.

- 3. If you have no tagging requirements, what method of enforcement/reporting is being used?**

Texas has its own tagging requirements.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Not used at state level, but hearing of many cities using third party reporting or considering it.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Would consider the tagging program, but hesitant to change what is in place.

Utah

Did not respond.

Vermont

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011 Edition NFPA 25 is adopted.

b. Who enforces NFPA 25 requirements?

Fire marshals enforce both the fire and building codes in Vermont.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Systems need be inspected annually by a Technically Qualified Person (TQP).

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, Vermont has its own tagging requirements.

a. What are the specific tags used?

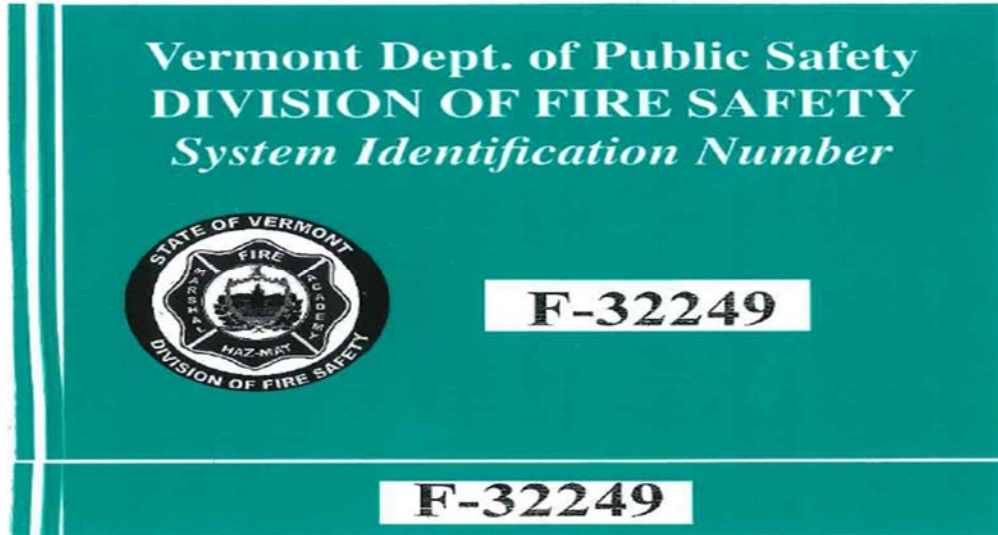


Figure 3 - Example of Vermont System Identification Number Tag



Figure 4 - Example of Vermont Proof of Inspection Tag

b. How are the tagging requirements enforced?

Vendors affix the tag to each riser when conducting their annual inspection.

c. What reporting form is used?



VERMONT DEPARTMENT OF PUBLIC SAFETY
DIVISION OF FIRE SAFETY
 Office of the State Fire Marshal, State Fire Academy and State Haz-Mat Team
 firesafety.vermont.gov



TQP Inspection Report

Return this completed form to the appropriate Regional Office

Barre Regional Office 1311 US RTE 302, Suite 500 Barre, VT 05641 Phone: (802) 479-4434 Fax: (802) 479-4446	<input type="checkbox"/>	Rutland Regional Office 56 Howe Street, Building A, Ste 200 Rutland, VT 05701 Phone: (802) 786-5867 Fax: (802) 786-5872	<input type="checkbox"/>	Springfield Regional Office 100 Mineral Street, Suite 307 Springfield, VT 05156-3168 Phone: (802) 865-8883 Fax: (802) 865-8885	<input checked="" type="checkbox"/>	Williston Regional Office 372 Hurricane Lane, Suite 102 Williston, VT 05496 Phone: (802) 879-2900 Fax: (802) 879-2312
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VT State ID	F-29407	RECEIVED
TQP Certification No.	T3-506	AUG 28 2014
Employer ID*	25514	DIVISION OF FIRE SAFETY BARRE REGIONAL OFFICE
Sticker No.	14-01177	
Inspection Date	08/26/14	

Name of Building: Therapeutic Health Center Site #: _____
 911 / or Physical Address: Rt.2.
 Town: Middlesex Zip Code: 05633

Owner: <u>State of Vermont</u>	Telephone: <u>(802) 828-1480</u>
Owner's Address: <u>135 State St.</u> State <u>VT</u>	Zip Code: <u>05602</u>

Inspection type: Fire Alarm Suppression Sprinkler Generator

If an ID sticker is being removed or replaced provide the inactive VT State ID number: _____

Inspector Name (print): Mark Rippon Employer: State of Vermont

Signature of Inspector: *Mark Rippon*

AFFIX ID STICKER HERE FOR NEW OBJECTS

Violations Noted: Yes No (please use additional pages as necessary)

* This ID is not your employer's federal tax ID, it is assigned by the Department - please contact the Department if you are unsure of what number your employer has been assigned.

- A copy of this inspection report must be forwarded to the Regional Office within 14 working days.
- This report does not relieve the Inspection Company of keeping and maintaining the reports required by NFPA.

Figure 5 - Example of Vermont TQP Inspection Report

d. Who is authorized to tag a system? Who can remove a tag from a system?

Only a TQP is authorized to tag and remove the tag from a system.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Vermont has its own tagging requirements.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Maybe, but a slim chance as they prefer what is now in place. Future plans are to have data entry done electronically by the vendors. Currently, it is done by hand.

Virginia

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

Virginia adopted the 2011 edition of NFPA 25, as of July 14, 2014.

b. Who enforces NFPA 25 requirements?

It is enforced by fire prevention inspections, either by the State Fire Marshal's Office for state owned property or the localities' fire officials/fire marshals where the code has been adopted.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Usually it is a quarterly inspection for sprinkler systems. It depends on the different AHJs interpretation of the code. Each locality can choose to adopt the fire code or not. When they do not adopt the code, then the State Fire Marshal's Office enforces what the code requires. That also includes all state owned property.

2. Do you have mandated tagging requirements for water-based fire protection systems?

The state does not implement any water-based tagging requirements, other than for system impairments under 901.7 "Systems out of Service" found in the ICC Fire Prevention Code, adopted in Virginia with amendments as the Virginia Statewide Fire Prevention Code.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Virginia State Fire Marshal Office conducts fire prevention inspections of the facilities that they are required to inspect, and part of that inspection is the fire protection system inspection reports.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

If there is a cost, it very well may not be adopted.

Washington

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

2011 edition

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

Enforcement is done by local authority having jurisdiction which could be a fire marshal, fire official, building inspector, building official.

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

Mostly enforce the annual inspections only

2. Do you have mandated tagging requirements for water-based fire protection systems?

a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)

Service tags differ with specific testing companies. Typically, they need to include the company, when testing was done, gauge readings, what type of testing, date, name of person, all contact information and recommended retest date.

b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?

Tagging is enforced during annual inspections or when testing papers are received. Typically the time frame is 15 days or 30 days depending on jurisdiction. If it is

a life safety issue for the buildings, then it needs to be addressed and corrected immediately or fire watch needs to be established until remedied.

c. If yes, what reporting form is used? Is there a jurisdiction specific form?

Report forms differ per testing company but must include all the basic information. They have a competency form that is used for initial testing of systems but can be used for notifying entities of a problem.

d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

Typically, the company doing the testing is able to tag the system. The AHJ is also able to tag if the system has a problem that needs to be addressed.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Typically, the enforcement is carried out through notification by the testing company and contact with the owner.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

State does not use a 3rd party but some districts and departments use Tegriss.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

NFPA 25 is the standard that is used and whether specifically adopted, reference is made at the local jurisdiction to recognize and use the document. Guidance would be ideal and give a basic template for folks to use. Again, adoption lies with the jurisdiction.

West Virginia

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

2011 edition is the current adopted edition.

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

The fire official would be who enforces.

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

By the requirements of NFPA 25, normally quarterly for Health Care

2. Do you have mandated tagging requirements for water-based fire protection systems?

- a. **If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)**

Tags are supplied by the Inspecting Company.

- b. **If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?**

We also review the inspection form that is left at the facility. If an impairment is found, immediate resolution is required.

- c. **If yes, what reporting form is used? Is there a jurisdiction specific form?**

It is noted on our fire safety inspection form.

- d. **If yes, who is authorized to tag a system? Who can remove a tag from a system?**

Only West Virginia licensed Fire Protection Workers or NICET certified personnel

4. ***Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)***

No third party reporting system

5. ***If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?***

We would need to review before the program before making a decision.

Wisconsin

1. ***Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems? a. If yes, which edition is adopted?***

Yes, by reference from NFPA 1 and NFPA 1 refers to NFPA 25, 2011 edition.

Reference:

http://docs.legis.wisconsin.gov/code/admin_code/sps/safety_and_buildings_and_environment/361_366/362/0901

http://docs.legis.wisconsin.gov/code/admin_code/sps/safety_and_buildings_and_environment/301_319/314

2. ***Do you have mandated tagging requirements for water-based fire protection systems?***

Yes, this is covered in 8.17.2.4.7.1 of NFPA 13

- a. **If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)**

Each fire department connection to sprinkler systems shall be designated by a sign having raised or engraved letters at least 1 in (25.4mm) in height on a plate or fitting reading service design. For example, AUTOSPKR., OPEN SPKR., and STANDPIPE

- b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?**

Each fire inspector inspects these tags twice per year. If tag is non-compliant the fire inspector provides a reasonable amount of time to correct, i.e., 30 days. If no correction is made, then an order is written with a required completion date.

- c. If yes, what reporting form is used?**

We use a standard inspection created by DSPS.

Is there a jurisdiction specific form?

No

- d. If yes, who is authorized to tag a system? Who can remove a tag from a system?**

Any fire inspector that has been appointed by the local fire chief

Wyoming

Did not respond.

3. Tagging Requirements at the City Level

By sending out the survey questions listed in Section 2 (also available in appendix) to several cities, the information about the adoption and enforcement of NFPA 25, the tagging requirements or reporting system for water-based fire protection system, and the willingness of each city to adopt the annex guidance for a tagging program if provided by NFPA 25 was gathered.

Los Angeles

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the metro fire department?

Reference 2011 edition NFPA 25

b. Who enforces NFPA 25 requirements?

Enforced by the Los Angeles fire department

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Quarterly, one (1) year, and five (5) year

2. Mandated tagging requirements for water-based fire protection systems?

No tagging requirements

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Yes, Los Angeles relies on a reporting form for each fire protection system rather than the tags; they are establishing the online program to make all this information available to be assessed by the stakeholders. Los Angeles has had its own inspection and testing program since 1967. The program is for all types of fire protection systems. Only program certified individuals are accepted to do the inspection and testing.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Yes, Los Angeles is considering using the third party reporting system, which is in process.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Not sure

New York City

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the metro fire department?

Reference the 2011 edition NFPA 25

b. Who enforces NFPA 25 requirements?

Enforced by the Fire Department City of New York (FDNY) only

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, FDNY has its own tagging requirements.

a. What are the specific tags used?

Yellow, Orange, and Red (No green)

b. How are the tagging requirements enforced?

When Fire Prevention finds out, we issue a 30 day violation.

d. Who is authorized to tag a system? Who can remove a tag from a system?

Licensed contractor, certificate of fitness holder

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Would need to see the details, but the FDNY is committed to national standards except where New York City specific requirements are deemed necessary.

Phoenix

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011

b. Who enforces NFPA 25 requirements?

Self-inspection and third party annual report uncorrected deficiencies to Phoenix Fire Department (PFD) within 30 days.

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Annual

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes

a. What are the specific tags used?

Tags vary by inspection service but should be clear and attached.

b. How are the tagging requirements enforced?

By inspection of new construction and annual for state licensed facilities and complaint. Rely on the tags given to the system and visual clues to determine the operability of the system. For systems tagged as having an impairment, they have 30 days to report and 30 days to correct, unless fire watch required for imminent hazards.

c. What reporting form is used?

The inspection report from the approved third party inspection is required to be sent in only for deficiencies, otherwise no deficiency reports are to be kept on site. No jurisdiction specific form is used.

d. Who is authorized to tag a system? Who can remove a tag from a system?

Approved fire contractor with qualified inspectors can tag a system; AHJ or re-inspection can remove the tag and tag it again.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Tags and reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No, but will accept them. Do not want to be inundated.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Would consider it

Las Vegas

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011

b. Who enforces NFPA 25 requirements?

A combination of Office of State Fire Marshal and Local AHJs

c. What is the level of frequency of enforcement of NFPA 25 provisions?

According to the requirements of NFPA 25, but also based on the system

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

Inspection reports

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Yes, Las Vegas accept third party reporting systems, but that is not required.

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Probably not, need more information from the program

Boston

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. If yes, which edition is adopted?

2011 adopted

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

Enforced by Fire Department and Building Department

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

As required by NFPA 25, summary of test reports once a year

2. Do you have mandated tagging requirements for water-based fire protection systems?

a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)

See NFPA requirement

b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the

system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?

As required by permit and log book

c. If yes, what reporting form is used? Is there a jurisdiction specific form?

Log kept at fire command center

d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

Contractor with oversight of impairment coordinator or owner

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Possible, but would have to see it.

San Francisco

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection System?

Yes, we adopt NFPA 25.

a. If yes, which edition is adopted?

The 2011 Edition of NFPA 25 including Annexes A, B, C, D & G as amended by the State of California. The amended NFPA 25 Standard is published as NFPA 25 2013 California Edition.

b. If yes, who enforces NFPA 25 requirements?

In accordance with California Health and Safety Code Section 13145, the Chief of the San Francisco Fire Department and all his/her authorized representatives shall enforce all the requirements of NFPA 25 2013 California Edition adopted by the State Fire Marshal.

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions?

The level of frequency of enforcement is in accordance with NFPA 25 2013 California Edition.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Yes, the tags used on water-based fire protection systems are called "labels".

a. If yes, what are specific tags (labels) used? What is not included? (Please attach a copy of the tagging regulations if possible)

A copy of Article 6 of California Title 19 which mandates the tagging or labeling requirements is attached (Attachment A).

- b. If yes, how are the tagging requirements enforced? Do you rely on the tag system after an inspection to make your determination on the operability of the system? For a system tagged as having impairment, do you have a required time frame to fix the problem?**

If a label (example a five-year label) is not installed on a water-based fire protection system, the Fire Inspector can assume that the system is impaired or inoperable and may issue a Notice of Violation to the Owner. The time frame to fix the problem depends on the severity of the impairment.

- c. If yes, what reporting form is used? Is there a jurisdiction specific form?**

See Attachment B for the list of the forms mandated by the State of California to be used to record the results of all inspections, testing and maintenance of water-based fire protection systems. The forms are called Automatic Extinguishing System (AES) forms.

- d. If yes, who is authorized to tag a system? Who can remove a tag from a system?**

In the State of California, the following entities can provide Inspection, Testing and Maintenance and hence can tag or label water-based fire protection systems.

- a. A qualified California State Contractor State Licensing Board Licensed Fire Protection Contractor (C-16)
- b. A qualified California State Fire Marshal Licensed A (Type 1) Concern, or
- c. A qualified Owner California State Fire Marshal Licensed A (Type L), or
- d. A qualified Owner's representative.

Per Title 19 Chapter 5 Article 4 Section 906.3 Removal of Labels or Tags, no person shall remove a tag or label from an automatic extinguishing system except when service is performed by any of aforementioned concern or person.

- 3. If you have tagging requirements, what method of enforcement/reporting is being used?**

The methods of enforcement/ reporting are all in accordance with Laws and Regulations for Automatic Extinguishing Systems 2014 Edition which includes:

- a. California Health and Safety Code Sections 13195 – 13199
- b. California Business and Professions Code Sections 17200 and 17500
- c. California Code of Regulations, Title 19 Chapter 5 Automatic Fire Extinguishing Systems

- 4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or other please specify)**

No, they do not use a third party reporting system. They use the AES forms listed on Attachment B developed by the Office of State Fire Marshal.

- 5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it.**

They will adopt annexes that are adopted by the State of California.

Attachment A: Tagging or Labeling Regulations – Title 19 Chapter 5 Article 6 Labels, Tags and Forms

Article 6. Labels, Tags and Forms

§906. General

- (a) Labels shall be used on water-based fire protection systems.
- (b) Tags shall be used on engineered and pre-engineered fixed extinguishing systems.
- (c) Labels and tags shall be white with black letters. They shall be five and one-fourth inches (5-1/4") in length, and two and five-eighth inches (2-5/8") in width with a one-fourth inch (1/4") tolerance for each dimension. One sample label and/or tag shall be submitted to the Office of the State Fire Marshal for approval. (d) The following information shall be printed on labels and tags approved by the Office of the State Fire Marshal:
 - (1) The words "DO NOT REMOVE BY ORDER OF THE STATE FIRE MARSHAL."
 - (2) Concern Name.
 - (3) Concern Physical Address.
 - (4) License Number. (California State Fire Marshal "A" license or State of California Contractors State License Board license)
 - (5) Date of service or testing and maintenance.
 - (6) The Seal of the Office of the State Fire Marshal.
 - (7) Space or line for signature of person performing or supervising the service or testing and maintenance work.
- (e) When service or testing and maintenance is performed, the initial date of service or testing and maintenance, the printed name and signature of the person performing or supervising the servicing shall be placed on the tag or label. A hole shall be clearly punched in the appropriate boxes.
- (f) No person shall remove a tag or label from or place a tag or label on an automatic fire extinguishing system except when service or testing and maintenance is performed.
- (g) No person shall deface, modify, or alter any tag or label attached to or required to be attached to any automatic fire extinguishing system.
- (h) The label or tag conforming to this section shall be securely attached to each automatic fire extinguishing system at the time of service or testing and maintenance.
- (i) The label or tag approved by the Office of the State Fire Marshal shall be affixed to a system only after all deficiencies have been corrected.
- (j) Adhesive labels shall be manufactured in accordance with ANSI/UL 969, Standard for Marking and Labeling Systems, 4th edition, 1995, which is hereby incorporated by reference.

NOTE: Authority cited: Section 13195, Health and Safety Code. Reference: Section 13195 Health and Safety Code.78 REV. 10/13/2014

§906.1. Water-Based Fire Protection System Testing and Maintenance Labels

- (a) The label shall be placed:
 - (1) On the fire department connection or on the riser for Class I, III, and combined standpipes and on the hose outlet closest to the front door for Class II standpipes,
 - (2) On or adjacent to the fire department connection or on the riser for fire sprinkler systems and,
- (b) The following format shall be used for all labels:

NOTE: Authority cited: Section 13195, Health and Safety Code. Reference: Section 13195, Health and Safety Code.

§906.2. Engineered and Pre-Engineered Fixed System Service Tags

(a) The tags shall be of the hanging type with the option of a self-adhesive type. Tags shall be placed on the agent supply tank enclosure or manual pull device for pre-engineered and engineered fixed systems.

(b) The following format shall be used for all tags:79 REV. 10/13/2014

NOTE: Authority cited: Section 13195, Health and Safety Code. Reference: Section 13195, Health and Safety Code.

§906.3. Removal of Labels or Tags.

(a) No person shall remove any label or tag required by this Article from an automatic extinguishing system except when service is performed.

(b) No person shall deface, modify, or alter any label or tag required by this Article to be attached to any automatic extinguishing system.

Attachment B:

Table 906.4(a) California State Fire Marshal Automatic Extinguishing Systems (AES) Forms

	Description	Frequency	Retained On Site	Forward to AHJ
AES 1	Inspection, Testing & Maintenance Cover Sheet		X	X
	Sprinkler Systems			
AES 2.1	Wet Pipe Sprinkler System	Quarterly/ Annual	X	
AES 2.2	Wet Pipe Sprinkler System	Five Year	X	X
AES 2.3	Dry Pipe Sprinkler System	Quarterly/ Annual	X	
AES 2.4	Dry Pipe Sprinkler System	Five Year	X	X
AES 2.5	Pre-action Sprinkler Systems	Quarterly/ Annual	X	
AES 2.6	Pre-action Sprinkler Systems	Five Year	X	X
AES 2.7	Deluge Sprinkler Systems Water Spray	Quarterly/ Annual	X	
AES 2.8	Deluge Sprinkler Systems Water Spray	Five Year	X	X
AES 2.9	Main Drain Test Continuation Form		*	*
AES 3	Standpipe and Hose System	Quarterly/ Annual	X	
AES 3.1	Standpipe and Hose System	Five Year	X	X
AES 4	Private Fire Service Main	Quarterly/ Annual	X	
AES 4.1	Private Fire Service Main	Five Year	X	X
	Fire Pumps			
AES 5.1	Diesel Fire Pump	Weekly	X	
AES 5.2	Diesel Fire Pump	Annual	X	X
AES 5.3	Electric Fire Pump	Monthly	X	
AES 5.4	Electric Fire Pump	Annual	X	X
	Other Forms			
AES 6	Water Storage Tanks	Annual	x	x
AES 7	Water Spray Fixed System	Annual	x	x
AES 8	Foam-Water Sprinkler System	Annual	x	x

AES 9	Continuation Form for Deficiencies and Comments		*	*
AES 10	Corrective Action and Repairs Performed		*	*

Philadelphia

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes, by reference in our code

a. If yes, which edition is adopted?

NFPA 25, 2008 edition

b. If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)

Department of Licenses and Inspections

c. If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)

Department of Licenses and Inspections requires that all systems be currently certified in accordance with the adopted standard when they perform periodic building inspections.

2. Do you have mandated tagging requirements for water-based fire protection systems?

Only tags that are required by NFPA 25 or tags for equipment out of service (OOS).

a. If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)

No specific tag used, see links below for requirements

b. If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system?

Yes

For systems tagged as having an impairment, do you have a required time frame to fix the problem?

No, they state to diligently pursue repair.

c. If yes, what reporting form is used? Is there a jurisdiction specific form?

For certifying systems we have a standard form found at the following link:
<https://business.phila.gov/Documents/Licenses/FS-AnnualCer%202012.pdf>.

d. If yes, who is authorized to tag a system? Who can remove a tag from a system?

Only certified/trained fire protection workers holding a City issued license and that work for licensed fire protection companies can work on systems. See links for details: <https://business.phila.gov/pages/firesuppressioncontractor.aspx>, <https://business.phila.gov/pages/firesuppressionsystemsworkercertification.aspx>, and <https://business.phila.gov/pages/firesuppressionpermitreqs.aspx>.

3. If you have no tagging requirements, what method of enforcement/reporting is being used?

The state also require notification of systems OOS that effect more than 30,000 square feet on one floor or more than one floor affected. The requirement is to call the fire department as soon as possible so that dispatchers can note the impairment in the CAD system for the affected address.

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

No

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Probably, if it was not included in ICC model code amendments, they would strongly consider it.

Seattle

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?

Yes

a. What edition of NFPA 25 is used if adopted or referenced by the state?

2011 edition

b. Who enforces NFPA 25 requirements?

City Fire Marshal

c. What is the level of frequency of enforcement of NFPA 25 provisions?

Frequencies are according to the requirements of NFPA 25, but also based the system. Most are annual and semi-annual inspections, as well as based on risk assessment.

2. Do you have mandated tagging requirements for water-based fire protection systems?

No

a. What are the specific tags used?

Company tags and standard tags

Standard Tags are:

Red

Yellow

White

b. How are the tagging requirements enforced?

By company and fire department

d. Who is authorized to tag a system? Who can remove a tag from a system?

Company

4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)

Yes, compliance system

5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?

Up to AHJ

[Washington, DC](#)

Did not respond.

[Chicago](#)

Chicago's Fire Code makes a reference to the 1995 edition of NFPA 25.

4. Summary

This section is focused on summarizing the survey responses gathered from state and metro level authorities. Forty-six out of fifty states and nine out of ten cities contacted throughout the United States responded to the survey. The responses were compiled and analyzed using four categories:

1. The adoption situation of NFPA 25
2. Tagging requirements
3. The adoption situation of any third party reporting systems
4. Likelihood of adoption of annex guidance for a tagging program if provided by NFPA 25

Summary of Responses from States & Metros Involved in this Survey

Adoption of NFPA 25

Emails containing the survey questions were sent out to fifty state fire marshal offices in the United States, where forty-six responses were received. The remaining five states did not respond to the survey. Table 1 provides a summary of the survey responses.

Table 1 - Responses Received from Fifty State Fire Marshal Offices

States Responded	States Not Responded	States Not Reachable
46	4	0

Similarly, the survey questions were sent out to ten cities, out of which nine responses were received.

Table 2 - Responses Received from Ten Cities

Cities Responded	Cities Not Responded
9	1

For the forty-six states that responded to the survey, in summarizing the responses, shown in Table 3, it was observed that most states directly adopted NFPA 25. Those that did not directly adopt NFPA 25, referenced the document. There are two states which do not adopt NFPA 25 directly or by reference.

Table 3 - Summary of NFPA 25 Adoption in States Survey Responses

Adopts NFPA 25	References NFPA 25	States Do Not Use NFPA 25
28	16	2

Table 4 - Summary of NFPA 25 Adoption in City Survey Responses

Adopts NFPA 25	References NFPA 25
7	2

According to the survey results illustrated in Table 5 and Table 6, the adopted editions of NFPA 25 range mostly from 2002 to 2014 with the 2011 edition the most commonly adopted or referenced, both in states as well as cities.

Table 5 - Summary of Adopted Edition of NFPA 25 by Responding States

2014 Edition	2011 Edition	2008 Edition	2002 or Earlier Edition
3	20	10	8

Table 6 - Summary of Adopted Edition of NFPA 25 by Responding Cities

2014 Edition	2011 Edition	2008 Edition	2002 or earlier Edition
0	7	1	1

Regarding who enforces the NFPA 25 requirements and the enforcement frequency, the answers vary from state to state and city to city. Table 7 and Table 8 below summarize the gathered responses. The “yellow” fill inside the table corresponds to the enforcement frequency followed in each state and city.

Table 7 - Summary of the Enforcement Frequency and Agency of NFPA 25 by the Responding States

Enforcement Frequency	As Required by NFPA 25	Up to AHJ	Quarterly	Annually	Once Every Two Years	Once Every Three Years	3 to 4 years circle	Depends	Enforcement Agency
Alabama								Upon complaint	Local Jurisdictions
Alaska								Other	Fire officials
Arizona									OSFM and Local AHJs
Arkansas									
California									OSFM and Local AHJs
Colorado									Local Fire Official
Connecticut									Fire Marshal
Delaware									OSFM
Florida									Local AHJs
Georgia									OSFM and Local AHJs
Hawaii									Building owner
Idaho									OSFM and Local AHJs
Illinois									OSFM
Indiana									
Iowa									Licensed Fire Sprinkler Company and the Building

Enforcement Frequency	As Required by NFPA 25	Up to AHJ	Quarterly	Annually	Once Every Two Years	Once Every Three Years	3 to 4 years circle	Depends	Enforcement Agency
									Owner/Impairment Coordinator
Kansas									OSFM
Kentucky			Healthcare	Others					Fire Official
Louisiana									Fire and building officials
Maine									OSFM
Maryland									OSFM and Fire Code Official
Massachusetts									OSFM and Local fire dept. head
Michigan									Local AHJs
Minnesota									OSFM and Local fire code officials
Mississippi									Local jurisdiction
Missouri									Local AHJs
Montana									Fire Inspectors
Nebraska									OSFM
Nevada									AHJ
New Hampshire									OSFM and Local fire officials
New Jersey								Based on occupancy type	Local fire officials
New Mexico									
New York									Code enforcement official
North Carolina								Based on occupancy type	Owner and Fire Inspectors
North Dakota									
Ohio									OSFM
Oklahoma									Fire code officials
Oregon									Fire code officials
Pennsylvania									Dept. of Labor and Industry
Rhode Island									OSFM
South Carolina									Local AHJs
South Dakota									OSFM and local AHJs

Enforcement Frequency	As Required by NFPA 25	Up to AHJ	Quarterly	Annually	Once Every Two Years	Once Every Three Years	3 to 4 years circle	Depends	Enforcement Agency
Tennessee									OSFM and local AHJs
Texas									OSFM
Utah									
Vermont									Fire marshals
Virginia									OSFM and local fire officials
Washington									Local AHJs
West Virginia									Fire officials
Wisconsin									Local fire chief & Fire inspector
Wyoming									

Table 8 - Summary of the Enforcement Frequency and Agency of NFPA 25 by the Responding Cities

Enforcement Frequency	As Required by NFPA 25	Up to AHJ	Quarterly	Semi-Annual	Annually	2 Years	3 to 4 years	5 years	Depends	Enforcement Agency
Los Angeles										LAFD
New York City										FDNY
Phoenix										PFD
Las Vegas										OSFM and local AHJs
Boston										Fire dept. & building dept.
San Francisco										SFO fire dept. chief
Philadelphia										Dept. of licenses and inspection
Seattle										City Fire Marshal
Washington, DC										
Chicago										Chicago Fire Code

Tagging Requirements

According to the survey results, summarized in Table 9, the number of states having their own tagging requirements is less than those states that do not have their own tagging requirements. Whereas, there are more cities that have some tagging requirements.

Table 9 – Summary of Responding States’ and Cities’ Tagging Requirements

States & Cities That Have Tagging Requirements	States & Cities That Do Not Have Tagging Requirements
17 (S) + 5 (C)	28 (S) + 3 (C)

Regarding how specific tagging requirements are used and enforced, what reporting form is used, and who is authorized to tag and remove the tag, this information varies considerably depending on each state’s fire code. It is observed that, for those states that do not have tagging requirements, typically inspection reports or records are required to remain on site and available to the fire inspector upon request in accordance with the fire code.

Adoption of Third Party Reporting System

In reviewing the responses, third party reporting systems in general are less frequently used at the state level as compared to the city level. However in some states, third party reporting systems are used at the local level such as in a few local municipalities, districts, cities or jurisdictions. Table 10 summarizes the use of third party reporting systems.

Table 10 - Summary of Third Party Reporting System Use in Responding States and Cities

Use Third Party Reporting System at State or City level	Do Not Use Third Party Reporting System at State or City level
3 (S) + 3 (C)	33 (S) + 4 (C)

Out of thirty-three states that do not use third party reporting system at state level, seven of them use them at local levels. States that do not use or accept third party reporting systems indicated that the service provided by third party vendors is not adequate, and the belief that it is necessary for a third party system to be standardized before being widely accepted.

Adoption of Annex Guidance for a Tagging Program

The distributed survey also sought feedback regarding the likelihood of adoption or changing of existing programs if annex guidance for a tagging program were provided in NFPA 25. The responses, summarized in Table 11, indicated a nearly even split across adoption options.

Table 11 - Likelihood NFPA 25 Provided Annex Guidance for Tagging Program Adoption in Responding States and Cities

Will Adopt	Will Not Adopt	Neutral/May be/After review/Need more information
7 (S) + 1 (C)	9 (S) + 1 (C)	25 (S) + 6 (C)

The reasons why those states will not adopt this guidance are:

- A tag is necessarily less detailed than the actual inspection reports provided by the inspection contractor. Requiring a tag would add a level of bureaucracy without any additional level of safety.
- Like what they currently have in place, changes would only be accepted if there are significant value or benefits for tagging program.
- Fiscal impact

It is worth mentioning, that many of the states that responded favorably or remained neutral expressed a need for consideration of the proposed annex guidance before acceptance. The need for a compelling reason for change was mentioned, as well as an apprehension to changes that could prove to be too far from practices currently in place. Additional concerns included:

- Need a compelling reason above what present system provides.
- Any changes to the existing rule would involve a rule making process which involves public input and a committee of legislature; therefore, there is no guarantee that such a guidance can be accepted simply by virtue of its appearance in a future edition of NFPA 25.
- It could possibly be even more problematic to enforce if the language was restricted only to the Annex of the standard, because Annex statement is not “code” and not “enforceable as code”.
- What is the cost?

5. Appendix

Survey Questions:

1. Do you adopt NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems?
a. <i>If yes, which edition is adopted?</i>
b. <i>If yes, who enforces NFPA 25 requirements? (i.e., fire official, building official, or if other please specify)</i>
c. <i>If yes, what is the level of frequency of enforcement of NFPA 25 provisions? (i.e., as required by NFPA 25, quarterly only, annually only, or if other please specify)</i>
2. Do you have mandated tagging requirements for water-based fire protection systems?
a. <i>If yes, what are the specific tags used? What is not included? (Please attach a copy of the tagging regulations if possible)</i>
b. <i>If yes, how are the tagging requirements enforced? Do you rely on the tag given to the system after an inspection to make your determination on the operability of the system? For systems tagged as having an impairment, do you have a required time frame to fix the problem?</i>
c. <i>If yes, what reporting form is used? Is there a jurisdiction specific form?</i>
d. <i>If yes, who is authorized to tag a system? Who can remove a tag from a system?</i>
3. If you have no tagging requirements, what method of enforcement/reporting is being used?
4. Do you use a third party reporting system? If so, which one? (The Compliance Engine, Inspection Reports on Line, or if other please specify)
5. If NFPA 25 were to provide annex guidance for a tagging program, would you be likely to adopt a program or change your existing program to match it?