

Comments to proposed 2022 CT Fire Safety Code

1. Chapter 80 referenced standards, amended list of referenced NFPA codes list an edition year that does not exist. Older and newer editions of each code do exist.

NFPA 2-**19**

NFPA 10-**21**

NFPA 17-**20**

NFPA 17A-**20**

NFPA 55-**19**

NFPA 96-**20**

NFPA 211-**20**

NFPA 232-**19**

NFPA 415-**20**

(The proposed 2022 CT Fire Prevention Code does list the correct editions of the Codes referenced above).

2. Section 906 Portable fire extinguishers

Portable fire extinguishers should **NOT** be required in the following occupancies:

B, E, M, R-2, R-4 and S.

The goal of life safety should be to ensure all occupants evacuate the building in a safe and timely manner. For a fire extinguisher to be effective, a trained person must be on site to use the extinguisher. This is unlikely in most cases and would be extremely burdensome and time consuming if a fire marshal is expected to verify trained personnel are on site.

In addition, occupants will attempt to extinguish the fire prior to calling the fire department or activating the fire alarm system. This further delays evacuation of the building.

Fire extinguishers are effective and necessary in commercial kitchens, assembly occupancies in addition, occupancies where occupants cannot be evacuated (detention, health care, etc...).

Comments to proposed 2022 CT Fire Prevention Code

1. Table 13.6.1.2

Eliminate two sections of table “where required after 10/01/2018” and “where we required before 10/01/2018”. Required in the following occupancies:

Ambulatory health care group B medical

Assembly group A

Bed and Breakfast group R-1

Detention and correctional group I-3

Health Care group I-1 and I-2

Industrial group H

Change title to “Where Required” and list Yes for the occupancies listed above, No for all others.

Keep the CFPC the same as prior to 10/01/2018 in regards to portable fire extinguishers.

Thank you,

Edward Sargent, deputy fire marshal

City of Groton Fire Department

416 Benham Rd.

Groton, CT 06340

sargente@cityofgroton-ct.gov

860-446-4106