



**OFFICE OF THE FIRE MARSHAL
TOWN OF BRIGHTON**

2300 ELMWOOD AVENUE – ROCHESTER, NEW YORK 14618
(585) 784-5220 OFFICE (585) 784-5207 FAX

Christopher A. Roth

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Thursday, September 11, 2014

Re: Certification Standards for Kitchen Fire Suppression System Contractor

Dear Fire Protection Contractor:

The Town of Brighton – Office of the Fire Marshal makes the following ruling for certification and training of technicians who perform service on fire suppression systems.

Included in the scope of these recommendations are those technicians who install and/or service Wet Chemical systems (per NFPA 17A) typically used to protect commercial cooking equipment, and/or Dry Chemical Systems (per NFPA 17) typically used to protect various types of paint spray booths, and other industrial hazards.

The Office of the Fire Marshal defines a fire protection contractor as

*A “**Fire Suppression System Contractor**” is a contractor holding a valid Town of Brighton Fire Protection Contractor or City of Rochester Fire Department Fire Extinguishers License. Fire protection contractors are also required to be factory trained or certified for the brand, make and/or model of system, any work shall be performed by qualified and trained persons having available the appropriate recall notices and servicing manual(s), the proper types of tools, and manufacturer’s recommended replacement parts or parts specifically listed for such use.*

First, some background information about the current certification process in the industry as it relates to service and installation of these systems. The manufacturers of fire protection systems currently provide training and certification for individual technicians, or for the companies they represent. Typically, such certification of training is required before the manufacturer will sell product to the distributor. In addition, the manufacturers typically will provide training and certification exclusively for the distributors who sell and install their product line. The manufacturers offer this training on an on-going basis, and require re-training, typically at no less than two-year intervals. Technicians who are certified by the manufacturers have received product-specific hands-on training and training in the applicable NFPA standards (17, 17A, 96 and 33).

In addition to the product-specific training and certification provided by the manufacturers, there are a number of third-party practical hands-on training programs which are nationally recognized by our industry. These “generic” training programs typically trains technicians on the proper service of all brands of systems. One such training program is Fire Protection Certification Ltd. (FPC Ltd.), and details of their training and certification programs can be viewed at <http://www.fpcltd.com/seminars.html> .

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A third type of certification has been developed in recent years by our national trade organization (National Association of Fire Equipment Distributors) and is now administered by the International Code Council (I.C.C.). This certification involves rigorous testing of technicians on the code requirements of NFPA 17, 17A, 96, and 33.

The National Fire Protection Association refers to “qualified” and “certified” in specific chapters within their reference standards. Below are excerpts from some of these various standards which support our position, that a Fire Suppression System Contractor **shall be tested and certified or trained by the manufacturer or independent third party.**

1. Chapter 17A Wet Chemical Extinguishing Systems – 2009 Edition – Section 7.3.1 refers to a service technician shall be trained passed a written or on-line test....

NFPA 17A - Section 7.3.1* *A service technician who performs maintenance on an extinguishing system shall be trained and shall have passed a written or online test that is acceptable to the authority having jurisdiction.*

2. Chapter NFPA 96 - Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations – 2008 Edition- Section 3.3.9 refers to certified as a formally stated recognition and approval acceptable to AHJ.

NFPA 96 - 3.3.9* Certified. *A formally stated recognition and approval of an acceptable level of competency, acceptable to the AHJ.*

A.3.3.9 Certified. Certification can be provided by the manufacturer of the listed equipment being serviced or an independent third party.

3. Chapter 17 Dry Chemical Extinguishing Systems – 2008 Edition – Section 11.1.3 refers to trained personnel having undergone the instructions necessary perform maintenance ...

NFPA 17 - 11.1.3* *A trained person who has undergone the instructions necessary to perform the maintenance and recharge service reliably and has the applicable manufacturer’s installation and maintenance manual and service bulletins shall service the dry chemical extinguishing system at intervals not more than 6 months apart as outlined in Section 11.3.*

4. Chapter 10 Standard for Portable Fire Extinguishers – 2007 Edition – Section 3.3.4 states persons certified through a formal certification program or by manufacturer....

NFPA 10 - 3.3.4* Certified Person. *A person that has been certified by a recognized organization through a formal certification program or by an equipment manufacturer that has a certification program, that is acceptable to the authority having jurisdiction.*



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All the above NFPA reference standards are currently adopted and enforceable by the 2010 Fire Code of New York State. Please refer to FCNYS Chapter 45 Referenced Standards.

We are recommending and recognize a blend of these three types of training and certification processes. In our jurisdiction, within the Town of Brighton, installation of a new or modification to a fire protection systems requires a fire code permit, plans review, and final inspections and acceptance testing. This required fire code permit process gives us a logical and definable distinction between **Installation** and **Service**.

Thus, we recognize the implementation of a two-tiered certification process as follows:

1) Only *manufacturer's certification* should be recognized and accepted for all permitted work (including **installation** and **modifications** requiring permits).

Manufacturer's certificates should accompany all plans submittals for such work. As the Manufacturer's Certificate encompasses hands-on training and codes requirement training, this is the only certification necessary for installation and modification of these systems.

2) This same *manufacturer's certification* should be recognized and accepted for **maintenance** and **service** of the manufacturer's systems only.

3) For the **maintenance** and **service** of systems other than those for which the servicing company and/or the technician holds a manufacturer's certificate, the following combination of certifications shall be recognized and approved:

a) A certificate of training from a *recognized third party hands-on training* (such as FPC Ltd., NAFED, etc.),

AND

b) A certificate from an *ICC style test* on the applicable codes (NFPA 96, 33, 17 and 17A),

OR

c) Meeting the current licensing requirements of the National Institute for Certification in Engineering Technologies ("NICET") or holding a license to engage in the Kitchen Fire Suppression System Contractor trade issued by the City of Rochester or holding any other license to engage in the Kitchen Fire Suppression System Contractor trade issued by another jurisdiction which the Chief Fire Marshal determines has requirements for its issuance that are substantially similar to the licensing requirements of the City of Rochester or of NICET.

In all cases, service technicians must also have the manufacturers' service manuals, access to the appropriate recall notices and tools for each brand of system serviced

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A Kitchen Fire Suppression System Contractor Certification shall be valid for one year and re-certify annually demonstrating the requirements for manufacturer instruction or third party continuing education credits are maintained.

While it might seem simpler to recognize only manufacturers' certificates, there are a number of reasons for our recommendation that the Town of Brighton recognize third-party certificates for service and maintenance.

Among them are,

1. Greater access to the market will result from this less-restrictive approach, and the enhanced trade will in turn benefit the consumers of fire protection services.
2. Many areas are served by one or two fire equipment distributors, and there are many systems in place for which manufacturer's distributors are not readily available.
3. Many restaurants and institutions who use these services have systems in place which are of multiple brands. These end-users typically prefer to do business with a single service provider, and it might be unduly cumbersome to require them to do otherwise.
4. Some Kitchen Fire Suppression System Contractors have existing customers, where maintenance and inspection services have been previously provided long term. This tiered approach towards training and or certification allows for these contractors to use of qualified third party approved in-service training program to obtain or maintain in-service or continuing educational credit(s).

In closing, this is a "win-win" situation using a tiered approach, which allows you as a fire protection contractor to either continue receiving factory or manufacturer in-service training / certification from the companies or product line(s) they represent. While other "qualified" fire protection contractors can preserve their existing inspection and maintenance services through third party in-service training and hands on education.

Ultimately, the customer and the public continue to receive the best fire protection maintenance and inspection services available.

If you have any questions or wish to discuss this matter further please feel free to contact me directly.

Respectfully,

A handwritten signature in black ink that reads "Christopher A. Roth".

Christopher A. Roth
Chief Fire Marshal

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