

June 26, 2024

## RE: PILOT PROGRAM FOR RANGE HOOD INSTALL FORMS, CHANGES TO E-3 AND E-4 CERTIFICATIONS, AND CHANGES TO STATE CODE EFFECTIVE DATE FOR SECTION 904.1 REQUIREMENTS

Dear Systems Testing Company/Technician,

The Seattle Fire Department (SFD) is writing to contractors who install and service kitchen hood suppression systems or other alternative extinguishing systems. This letter provides information regarding a pilot program for kitchen hood suppression system reporting related to installation of new kitchen hood systems. It also provides information on a delay in the effective date of State law on NICET vs ICC/NAFED certifications, and a small but important upcoming reorganization of SFD's E-series certifications, that will move spray booths out of the E-4 series into the E-3 series, leaving the E-4 for kitchen hood suppression systems only.

Acceptance/Installation SFD is one of many Puget Sound area fire departments that has begun a "pilot" program of a new acceptance or "install" form for use when new Kitchen Hood Suppression Systems are installed. This reporting form is used to obtain contractor statement of pre-testing completion. The reporting form will be submitted to SFD through our third party vendor, The Compliance Engine (TCE) at <a href="www.thecomplianceengine.com">www.thecomplianceengine.com</a>. As part of the submittal, contractors will also be required to provide device counts and upload a limited number of commissioning documents for use by building owners and their engineers and maintenance contractors in the future. These documents are essential for guiding annual testing and repairs for the life of the systems. The form is based on NFPA 17A Figure 7.4.10.3.

**Inspection, Testing and Maintenance (ITM)** SFD is one of many King County fire departments that is also "piloting" an update to our existing Kitchen Hood Suppression-ITM form for reporting recurring inspection, testing, and maintenance. Hood systems must be tested and maintained at least every six months, with venting cleaned when dirty. We have made small updates to our existing Kitchen Hood Suppression-ITM form to align inventory reporting with the new Kitchen Hood Suppression-Install form.

**Regional Deployment** A committee of regional fire marshals worked with kitchen hood contractors to develop the new Kitchen Hood Suppression-Install form, which will be used by many fire departments throughout the Puget Sound region.

**Duration of Pilot Program and Start of Mandatory Usage** This form is now available in TCE in a BETA version for an optional pilot, and will become mandatory for new kitchen hood installations beginning **no sooner than September 1 in Seattle.** Please check with other fire marshals for the timeline in their jurisdiction.

Submittal of Install forms will not be required for obtaining certificate of occupancy during the pilot phase. We encourage you to become familiar with these forms by using them on projects before they are mandatory.

Forms may be reviewed on our website: <a href="https://www.seattle.gov/fire/business-services/systems-testing#systemstestingforms">www.seattle.gov/fire/business-services/systems-testing#systemstestingforms</a>

**Frequently Asked Questions** Please see our FAQ for more information on the following questions: www.seattle.gov/documents/Departments/Fire/Business/Acceptance%20Test%20FAQs.pdf

- Are the Acceptance/Install forms required when seeking temporary certificates of occupancy (TCO)? No – just when you have completed the system installation and are seeking final sign off from SFD.
- Are the Acceptance/Install forms required when modifying an existing system? No just for new or replacement systems.
- Will this change SFD's inspection protocols? The SFD inspector will require proof that the Install forms have been uploaded in TCE for the Seattle Fire Department, prior to providing final sign off on hood suppression system. Otherwise we are not introducing new inspection requirements as a result of the new reporting requirement.

**Personnel Qualifications and Manufacturer Training** The fire marshals' committee had multiple discussions on certification requirements for technicians installing new systems or maintaining existing systems. The following decisions were reached based on code research and consultations with experts around the state and at national organizations:

- Installation of New Systems Technicians will be required to hold ICC/NAFED or NICET Level 2 in Special Hazards Suppression Systems (2021 IFC 904.1 as amended by Washington State) and current training by the manufacturer of the system being installed.
- Existing Systems ITM Work All jurisdictions will require technicians to comply with 2021 IFC 904.1 and attest that they have access to the system manufacturer's manual and service bulletins. Some jurisdictions may also require manufacturer training based on local conditions and elected guidance. Manufacturer training will not be required for technicians that perform recurring testing and maintenance in Seattle.

Delayed Implementation of State 2021 IFC Certification Requirements The 2021 Washington State Fire Code included amendments to 904.1.1 that will require technicians working on automatic fire-extinguishing systems, other than automatic sprinkler systems, to possess a NICET Level II or higher in "special hazards suppression systems". The State code provides an exception for pre-engineered kitchen hood systems, which allows a current ICC/NAFED certification in lieu of the NICET Level II or higher. The original timeline identified in the 2021 code was July 1, 2024. However, on May 24, the State Building Code Council approved an amendment to that section that will delay the implementation date to January 1, 2025. The 2021 Seattle Fire Code will align with the state code in this respect. Technicians seeking SFD's E-series certification can present certifications consistent with 2018 WA Fire Code requirements through 12/31/2024. In order to obtain an E series certification on or after 1/1/2025, technicians will be expected to document their credentials complying with the 2021 Fire Code Section 904.1.1.

**Seattle E-3 and E-4 Certifications** To align with 2021 IFC 904.1 as amended by Washington State, SFD's E-series certifications will be rescoped so that the E-4 certification is reserved for kitchen hood suppression systems only. Spray booths will be moved to the E-3 series. This change will take effect on the date the rest of the 2021 Seattle Fire Code takes effect, which is currently expected to be no sooner than September 30, 2024. Technicians with E-3 and E-4 certification cards will have their scope grandfathered in until their card expires. For a summary of requirements, please refer to <a href="https://www.seattle.gov/documents/Departments/Fire/Business/What%20Cert%20Exam%20to%20Take.pdf">www.seattle.gov/documents/Departments/Fire/Business/What%20Cert%20Exam%20to%20Take.pdf</a>.

We are grateful to our systems testing companies and technicians for their ongoing contributions to fire prevention and fire safety. If you have questions, you can reach us by email at SFD\_FMO\_certification@seattle.gov or SFD\_FMO\_systemstesting@seattle.gov.

Respectfully,

Assistant Chief Timothy J. Munnis

Fire Marshal

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