

**Public Comment No. 3-NFPA 90A-2019 [Section No. 2.3.2]****2.3.2 ASTM Publications.**

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM C411, *Standard Test Method for Hot-Surface Performance of High-Temperature Thermal Insulation*, 2017 2019 .

ASTM D93, *Standard Test Methods for Flash Point by Pensky-Martens Closed Cup Tester*, 2018.

ASTM E84, *Standard Test Method for Surface Burning Characteristics of Building Materials*, 2018b 2019a .

ASTM E119, *Standard Test Methods for Fire Tests of Building Construction and Materials*, 2018c e1 .

ASTM E136, *Standard Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C*, 2016a 2019 .

ASTM E2231, *Standard Practice for Specimen Preparation and Mounting of Pipe and Duct Insulation Materials to Assess Surface Burning Characteristics*, 2018.

ASTM E2652, *Standard Test Method for Behavior of Materials in a Tube Furnace with a Cone-Shaped Airflow Stabilizer, at 750°C*, 2016 2018 .

ASTM E2965, *Standard Test Method for Determination of Low Levels of Heat Release Rate for Materials and Products Using an Oxygen Consumption Calorimeter*, 2017.

Statement of Problem and Substantiation for Public Comment

date updates

Related Item

- pi31

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler

Organization: GBH International

Street Address:

City:

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Submission Date: Mon Apr 15 15:02:29 EDT 2019

Committee:

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-4-NFPA 90A-2019

Statement: Date and title updates.

**Public Comment No. 5-NFPA 90A-2019 [Section No. 2.3.2]****2.3.2 ASTM Publications Standards .**

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM C411, ~~Standard- Test Method for Hot-Surface Performance of High-Temperature Thermal Insulation~~, 2017.

ASTM D93, ~~Standard- Test Methods for Flash Point by Pensky-Martens Closed Cup Tester~~, 2018.

ASTM E84, ~~Standard- Test Method for Surface Burning Characteristics of Building Materials~~, 2018b 2019a .

ASTM E119, ~~Standard- Test Methods for Fire Tests of Building Construction and Materials~~, 2018c.

ASTM E136, ~~Standard- Test Method for Behavior- Assessing Combustibility of Materials in-a~~ Using a Vertical Tube Furnace at 750°C, 2016a 2019 .

ASTM E2231, ~~Standard- Practice for Specimen Preparation and Mounting of Pipe and Duct Insulation Materials to Assess Surface Burning Characteristics~~, 2018.

ASTM E2652, ~~Standard- Test Method for Behavior-of-Materials-in-a~~ Assessing Combustibility of Materials using a Tube Furnace with a Cone-Shaped Airflow Stabilizer, at 750°C, 2016 2018 .

ASTM E2965, ~~Standard-Test- Test~~ Method for Determination of Low Levels of Heat Release Rate for Materials and Products Using an Oxygen Consumption Calorimeter, 2017.

Statement of Problem and Substantiation for Public Comment

As a global change, consistent with the change for UL standards, the word "standard" should be removed from all references to ASTM standards both in section 2, and in the annex on informational references and in all references throughout the standard. All ASTM documents referenced in NFPA 90A are standards. This public comment does not address the date changes from associated comments.

Note also the changes in title for ASTM E136 and ASTM E2652.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 3-NFPA 90A-2019 [Section No. 2.3.2]	
Public Comment No. 6-NFPA 90A-2019 [Section No. C.1.2.3]	
Related Item	
• fr4 • fr5	

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler
Organization: GBH International
Street Address:
City:
State:
Zip:
Submittal Date: Mon Apr 15 16:50:20 EDT 2019
Committee:

Committee Statement

Committee Action: Rejected
Resolution: The committee does not wish to delete the word "standard".

**Public Comment No. 2-NFPA 90A-2019 [Section No. 4.3.1.8]****4.3.1.8 Air Dispersion Systems.**

Air dispersion systems shall meet the following criteria:

- (1) They shall only be installed in entirely exposed locations, including raised floor systems .
- (2) They shall always operate under positive pressure.
- (3) They shall not penetrate fire resistance-rated construction.
- (4) They shall not pass through fire resistance-rated construction.
- (5) They shall be listed and labeled in accordance with UL 2518, *Air Dispersion Systems*.

Statement of Problem and Substantiation for Public Comment

The addition would clarify that installation in raised floor systems is permitted.

Related Item

- PI

Submitter Information Verification

Submitter Full Name: Kevin Gebke

Organization: Ductsox Corp

Street Address:

City:

State:

Zip:

Submittal Date: Wed Feb 13 09:35:32 EST 2019

Committee:

Committee Statement

Committee Action: Rejected

Resolution: This does not add clarity as a raised floor has two sides, one is exposed, the other not exposed. This was not addressed in the first revision cycle.

**Public Comment No. 9-NFPA 90A-2019 [Section No. 4.3.1.8]****4.3.1.8 Air Dispersion Systems.**

Air dispersion systems shall meet the following criteria:

- (1) They shall only be installed in entirely exposed locations.
- (2) They shall always operate under positive pressure.
- (3) They shall not penetrate fire resistance-rated construction.
- (4) They shall not pass through fire resistance-rated construction.
- (5) They shall be listed and labeled in accordance with UL 2518, *Air Dispersion Systems*.

Statement of Problem and Substantiation for Public Comment

I am commenting on proposed changes stated in Public Comment No. 16 in the Second Draft Report.

The addition of "They shall not connector to a duct penetrating a fire wall or fire assembly." is not required. Air Dispersion Systems connected to a duct penetrating a fire rated wall would not create any additional risk than simply installing a grille, register, or diffuser onto the wall where the duct penetrates the wall.

Related Item

- Public Comment No. 16 of the Second Draft Report

Submitter Information Verification

Submitter Full Name: Kevin Gebke

Organization: Ductsox Corp

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 01 11:46:32 EDT 2019

Committee:

Committee Statement

Committee Action: Rejected

Resolution: The proponent has not followed the established process for the public comment. It is unclear what the submitter is looking to address and has offered no specific changes.

**Public Comment No. 7-NFPA 90A-2019 [Section No. 4.3.5.1.2]****4.3.5.1.2 –**

~~The opening shall not be required to be large enough to permit maintenance of fire dampers, smoke dampers, or combination dampers where the damper is capable of remote inspection in accordance with NFPA 80 or NFPA 105.~~

Statement of Problem and Substantiation for Public Comment

In accordance with the comments from Ralph Koerber and John Wright I believe that this added section compromises safety.

Related Item

• fr15

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler

Organization: GBH International

Street Address:

City:

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Zip:

Submittal Date: Mon Apr 15 17:00:26 EDT 2019

Committee:

Committee Statement

Committee Action: Accepted

Resolution: [SR-2-NFPA 90A-2019](#)

Statement: The committee considers the negative comments during the voting process that this added section compromises safety. Full access to the dampers for maintenance and replacement of the devices is required.

**Public Comment No. 11-NFPA 90A-2019 [Section No. 5.3.4.3]****5.3.4.3**

The shaft enclosure shall have a minimum fire resistance rating (based on possible fire exposure from either side of the partition or wall) of 2 hours where such air ducts are located in a building four stories or more in height.

5.3.4.3.1

Where an air duct penetrates only one floor or one floor and an air-handling equipment penthouse floor, and the air duct contains a fire damper located where the duct penetrates the floor, an air duct enclosure shall not be required.

5.3.4.3.2 –

~~Fire dampers shall not be required to be installed in a ducted penetration of a penthouse floor where the air handler is installed in the penthouse.~~

Statement of Problem and Substantiation for Public Comment

As proposed, the new paragraph 5.3.4.3.2 conflicts with the prior paragraphs. Paragraph 5.3.4.3 requires a shaft enclosure for the penetrations of horizontal assemblies. Paragraph 5.3.4.3.1 exempts the shaft requirement by allowing fire dampers at the floor level when only one floor, including the floor of an air handling equipment penthouse, is penetrated. The new paragraph then says that the fire damper required by 5.3.4.3.1 is not required.

The Committee provided no technical justification for the change. The Committee statement for FR16 merely states that the change "addresses fire dampers in penthouse locations". No data, technical reports, or tests were submitted to support the change. In fact, there was no Public Input submitted to propose the change; but rather, a person submitted the proposed change during the Technical Committee meeting.

It should be noted that Koffel Associates, Inc. is a consultant to the Air Movement and Control Association (AMCA) but at the time this Public Comment was submitted, the comment was not approved by AMCA. Should this change prior to the Public Comment meeting, we will advise the Committee accordingly.

Related Item

- FR-16

Submitter Information Verification

Submitter Full Name: William Koffel

Organization: Koffel Associates, Inc.

Affiliation: Self

Street Address:

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Submittal Date: Mon May 06 14:14:42 EDT 2019

Committee: AIC-AAA

Committee Statement

Committee Action: Accepted

Resolution: [SR-3-NFPA 90A-2019](#)

Statement: As proposed, the new paragraph 5.3.4.3.2 conflicts with the prior paragraphs. Paragraph 5.3.4.3 requires a shaft enclosure for the penetrations of horizontal assemblies. Paragraph 5.3.4.3.1 exempts the shaft requirement by allowing fire dampers at the floor level when only one floor, including the floor of an air handling equipment penthouse, is penetrated. The new paragraph then says that the fire damper required by 5.3.4.3.1 is not required.

**Public Comment No. 8-NFPA 90A-2019 [Section No. 5.3.4.3.2]****5.3.4.3.2 –**

~~Fire dampers shall not be required to be installed in a ducted penetration of a penthouse floor where the air handler is installed in the penthouse.~~

Statement of Problem and Substantiation for Public Comment

The negative comments expressed during the balloting process indicate that there is not enough justification to make this change, which could affect safety.

Related Item

- fr16

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler

Organization: GBH International

Street Address:

City:

State:

Zip:

Submission Date: Mon Apr 15 17:04:27 EDT 2019

Committee:

Committee Statement

Committee Action: Accepted

Resolution: [SR-3-NFPA 90A-2019](#)

Statement: As proposed, the new paragraph 5.3.4.3.2 conflicts with the prior paragraphs. Paragraph 5.3.4.3 requires a shaft enclosure for the penetrations of horizontal assemblies. Paragraph 5.3.4.3.1 exempts the shaft requirement by allowing fire dampers at the floor level when only one floor, including the floor of an air handling equipment penthouse, is penetrated. The new paragraph then says that the fire damper required by 5.3.4.3.1 is not required.

**Public Comment No. 4-NFPA 90A-2019 [Section No. C.1.2.3]****C.1.2.3** ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E84, *Standard Test Method for Surface Burning Characteristics of Building Materials*, 2018b 2019a .

ASTM E136, *Standard Test Method for Behavior of Materials in a Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C*, 2016a 2019 .

ASTM E2231, *Standard Practice for Specimen Preparation and Mounting of Pipe and Duct Insulation Materials to Assess Surface Burning Characteristics*, 2018.

ASTM E2652, *Standard Test Method for Behavior of Materials in a Assessing Combustibility of Materials Using a Tube Furnace with a Cone-Shaped Airflow Stabilizer, at 750°C*, 2016 2018 .

Statement of Problem and Substantiation for Public Comment

date updates

Note also the changes in titles for ASTM E136 and ASTM E2652

Related Item

- pi32

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler

Organization: GBH International

Street Address:

City:

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Zip:

Submittal Date: Mon Apr 15 15:05:44 EDT 2019

Committee:

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-5-NFPA 90A-2019](#)

Statement: date and title updates

**Public Comment No. 6-NFPA 90A-2019 [Section No. C.1.2.3]****C.1.2.3 ASTM Publications Standards .**

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM E84, ~~Standard~~ *Test Method for Surface Burning Characteristics of Building Materials*, 2018b.

ASTM E136, ~~Standard~~ *Test Method for Behavior of Materials in a Vertical Tube Furnace at 750°C*, 2016a.

ASTM E2231, ~~Standard~~ *Practice for Specimen Preparation and Mounting of Pipe and Duct Insulation Materials to Assess Surface Burning Characteristics*, 2018.

ASTM E2652, ~~Standard~~ *Test Method for Behavior of Materials in a Tube Furnace with a Cone-Shaped Airflow Stabilizer, at 750°C*, 2016.

Statement of Problem and Substantiation for Public Comment

As a global change, consistent with the change for UL standards, the word "standard" should be removed from all references to ASTM standards both in section 2, and in the annex on informational references and in all references throughout the standard. All ASTM documents referenced in NFPA 90A are standards.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 5-NFPA 90A-2019 [Section No. 2.3.2]	
Related Item	
• fr4 • fr13	

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler
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Street Address:
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Submission Date: Mon Apr 15 16:56:12 EDT 2019
Committee:

Committee Statement

Committee Action: Rejected
Resolution: The committee does not to delete the word "standard".