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State Board of Examiners of Plumbing, Heating & Fire Sprinkler Contractors

August 10, 2015

Wade Laughon James M. Pleasants Company 910 Highway 321 NW, Suite 130 Hickory, NC 28601

Re: Fire System Components, Annual Inspections Consistent with NFPA 25

Dear Mr. Laughon

This letter follows a discussion at the June 2, 2015 meeting of the State Board of Examiners of Plumbing, Heating and Fire Sprinkler Contractors. At that meeting there was an open discussion of the statutory requirements, on-site realities, education, training and industry practice with regard to fire sprinkler pump installations as well as the conduct of periodic pump testing.

We are aware that fire pump personnel are routinely involved in the start-up and initial installation of the fire pumps associated with fire sprinkler system installations. The same is true of both electric and diesel drivers, and the controllers. We understand also that annual pump testing consistent with NFPA 25 is frequently performed by the same personnel and that these personnel are highly knowledgeable with regard to the pumps, drivers, and associated control panels.

We are also aware that for many years the Board has had in place licensure for fire sprinkler inspection contractors, persons who have demonstrated qualification to carry out the mandatory NFPA 25 annual inspection. The NFPA 25 annual inspection includes many components of a fire sprinkler system among which would be the pump, drivers, controllers and the associated pump testing.

Question has been raised whether the fire pump manufacturer's representatives, as factory-trained personnel, or ASE certified diesel mechanics, or controller reps, can carry out the annual testing associated with NFPA 25. The corollary to that question is whether the fire sprinkler inspection contractor is making a mistake or risking disciplinary action by the Board if the inspection contractor subcontracts the pump testing to a manufacturer's representative. A related question is whether the fire sprinkler inspection contractor is understood and expected to be able to rely upon the certification or work of factory-trained fire sprinkler pump testing personnel or the diesel mechanic or controller rep when the inspection contractor carries out the annual NFPA-25 annual inspection.

We are of the opinion that it is proper and prudent for the fire sprinkler inspection contractor to rely upon the work of the factory trained pump testing personnel or to subcontract that portion of the NFPA 25 inspection to the specially trained personnel and to rely upon that work in carrying out the NFPA 25 inspection. We hold the same view as to properly certified diesel mechanics or controller manufacturer's representatives. The fire sprinkler contractor then certifies to the owners all that comes within the NFPA 25 inspection. If the manufacturer's representative limits his work to the equipment he has provided and limits himself to his area of special training, we would not recommend pursuit of such persons as contracting without license. It is however not appropriate for the factory-trained pump testing personnel to contract the pump testing directly with a building owner; such contract should be directly with a properly licensed fire sprinkler inspection contractor. We hold the same view as to the driver, be it electric or diesel powered, as well as the controls. System failure has the same horrific consequences whether the result of the driver, the pump, the controls, the heads or otherwise. The NFPA 25 inspection report should not be rendered meaningless.

Persons involved with the maintenance, repair or replacement of components of fire sprinkler systems, such as motors, controls, pumps, should remember that, because of the critical interrelationships among all these things for the system to work when it must, there is no exemption allowing these things to be done without the licensed fire sprinkler contractor. Recertification of the system may be necessary, and that won't happen if the Fire sprinkler contractor is unaware. The same is true of replacement of heads, inasmuch as there are many types of heads which are not interchangeable.

Sincerely yours,

Dale Dawson
Executive Director