



February 16, 2021

Diane Glenn, Chair
State Building Code Council
PO Box 41449
Olympia, WA 98504

Chair Glenn,

The Washington State Association of Fire Marshals requests the enactment of a 120-day emergency rule to suspend the requirements of WAC 51-54A-904. Specifically, the requirements for International Code Council/National Association of Fire Equipment Distributors certifications for pre-engineered industrial or kitchen fire extinguishing systems and the National Association of Fire Equipment Distributors certification for engineered suppression system technicians.

This delay is needed to address the lack of qualified technicians to perform the design, installation, inspection/testing, or maintenance of these pre-engineered and engineered fire extinguishing systems. The following are the results of today's search conducted on the International Code Council's website for certified professionals within the State of Washington.

- 37 - Pre-engineered Kitchen Fire Extinguishing System Technicians
- 5 - Pre-engineered Industrial Fire Extinguishing System Technicians

Three weeks ago, there were no certified Engineered Fire Extinguishing System Technicians within the State of Washington.

Our Association supported and assisted in the drafting of these new regulations. However, the lack of certified professionals is extremely concerning for the successful implementation of these rules. The restaurant and hospitality industry has been devastated by the pandemic. Additionally, it would be significantly impacted by the lack of certified technicians who install, inspect, and maintain the suppression systems in kitchens. Any delays in these services would only further impact this struggling industry.

If the emergency rule is enacted, our Association will take the lead in partnering with trade, professional, and industry organizations on informing them of the new laws and how to navigate the certification process successfully.

We appreciate your consideration of our request.

Respectfully,

A handwritten signature in black ink that reads "Jon Napier".

Jon Napier, CFO, FM, CBO
2nd Vice President

CC: WSAFM Board
Norbert Makowka, NAFED

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Danny Harris, NAFED
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