



STATE OF LOUISIANA

DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

OFFICE OF STATE FIRE MARSHAL

EDWIN W. EDWARDS
GOVERNOR

COPY TO
ARCH'S
FYF.

FILE
WOOD SYSTEMS
COL. PAUL W. FONTENOT
DEPUTY SECRETARY

November 6, 1992

MEMORANDUM:

TO: All State Fire Marshal Inspectors and Fire Protection Equipment and/or Systems Contractors

FROM: Mr. Charles E. Fredieu *CF*
State Fire Marshal

RE: Office Policy on Pre-Existing Kitchen Hoods

Please find attached a copy of a formal interpretation of National Fire Protection Association (NFPA) 96, The Standard for the Installation of Equipment for the Removal of Smoke and Grease-Laden Vapor from Commercial Cooking Equipment, from the NFPA which indicates that fire suppression systems may be installed in a non-conforming kitchen hood and duct system.

Therefore, it will be the policy of this office to NOT cite the fire extinguisher contractor for kitchen hood or duct system deficiencies. Also, sub-standard hood and duct systems should NOT prevent the contractor from tagging a "good" fire suppression system.

Please note for clarification purposes that when a fire protection contractor services or inspects a kitchen system, that contractor's responsibility is limited only to the fire suppression system, and NOT the kitchen hood and duct system.

Regarding pre-existing kitchen hood and duct systems that are NOT in compliance with NFPA 96, State Fire Marshal inspectors should NOT automatically cite the owner for hood and duct systems that are NOT in compliance with NFPA 96. The inspector should use good judgment to ensure the system is NOT a "serious life safety hazard."

It is important to remember that inspections must be based on the code that was in effect at the time the fire protection equipment and/or system was installed, not necessarily the current code. To determine the code that was in effect, you must consult the appropriate version of NFPA 101, the Fire & Life Safety Code, that was in effect in this state at that time and look in the "Referenced Publications" chapter. I have attached a copy of a memorandum that lists the NFPA 101 codes and their effective date in this state for your convenience.

5150 FLORIDA BOULEVARD, BATON ROUGE, LA. 70806
(504) 925-4911 ARSON TIP LINE 1-800-272-8310

PRE EXISTING HOODS

1128

Memo to Inspectors and Contractors
RE: Non-Complying Hood and Duct Systems
November 6, 1992
Page 2

I realize that this is a "subjective" inspection, so I have listed some deficiencies that would be considered a "serious life safety hazard" by this office:

- Large holes or openings in the system from which fire could spread outside the hood may be considered a "serious life safety hazard."

(Please note that although riveted hoods are a violation of NFPA 96, if they are sealed tight, then they may NOT constitute a "serious life safety hazard.")

- Venting to the "attic" or other parts of the inside of the structure may be considered a "serious life safety hazard."

Venting to the outside of a structure is acceptable.

- Wooden hood and duct systems MUST be considered a "serious life safety hazard."

Please note that occupancy type may also play a role in determining if a non-complying, pre-existing hood and duct system poses a "serious life safety hazard." For example: if a hospital or nursing home had a pre-existing, non-complying kitchen hood system, then that would be a "serious life safety hazard," while a "Mom and Pop" grocery store in which no one lives that has a non-complying system would NOT pose a "serious life safety hazard."

Also note that all hood and duct systems, regardless of compliance with NFPA 96, MUST have an approved, certified fire suppression system installed inside the hood.

All commercial cooking with grease requires some type of hood and duct system.

Strict compliance to NFPA 96 in pre-existing hood and duct systems is not necessarily the policy of this office, but it is the policy of this office to ensure that all pre-existing systems meet the "intent" of NFPA 96 and that they do not pose a "serious life safety hazard."

1129

Memo to Inspectors and Contractors
RE: Non-Complying Hood and Duct Systems
November 6, 1992
Page 3

Again, I realize that you are being called upon to make a "subjective" inspection in reference to these non-complying hood and duct systems, but I believe you are professionals who understand the varying degrees of life safety in occupancy types. Therefore, I feel confident you will be able to administer this policy and still ensure public fire safety throughout this state.

Should you have any questions or problems with this policy, please discuss it with your supervisor. Also, should you be uncertain as to whether or not a certain non-complying hood and duct systems is a "serious life safety hazard" or not, you may want to discuss the circumstances with your supervisor before making a final determination.

Thank you for your continued cooperation and understanding as we work together to bring fire safety and prevention to a public that is not always as receptive or as committed as we are to this important issue.

CEF/JO/

C: Mr. Mike Cammarosano, Administrative Assistant
Mr. Rick Combs, Technical and Enforcement Services
Mr. Jerry Jones, Chief Architect
Mr. Roger Broussard, Staff Attorney
Mr. Jack Oliver, Licensing and Certification Section

ATTACHMENT - Copy of Formal NFPA Interpretation of NFPA 96
- Memo of Applicable NFPA 101 Codes & Their
Effective Dates

COMPUTER FILE NAME - "NFPA96-1"

1130

NFPA 96

Vapor Removal from Cooking Equipment

1987 Edition

Reference: 7-1.1
F.I.

Statement of Problem: Section 7-1.1 of NFPA 96 states that approved fire extinguishing equipment shall be provided for the protection of duct systems, grease removal devices, and hoods.

Question: Does the construction and installation of an existing exhaust hood and duct system have to comply with the requirements of Chapters 1, 2, 3, 4, 5, and 6 of NFPA 96 before the fire extinguishing equipment required in Chapter 7 can be installed?

Answer: No.

Issue Edition: 1976
Reference: 7-1.1
Date: January 1978

Copyright © 1988 All Rights Reserved
NATIONAL FIRE PROTECTION ASSOCIATION

RECEIVED
Office of State Fire Marshal

AUG 06 1992

Fire Marshal Licensing &
Certification Section
Baton Rouge, La.

1131

TOTAL P.02