



January 30, 2014

OSHA Portable Fire Extinguisher Standard (Annual Maintenance Certification Record)
29 CFR 1910.157 (e)(3)
Docket Number: OSHA-2010-0039

COMMENTS OF:
THE INTERNATIONAL CODE COUNCIL (ICC)
500 New Jersey Ave, NW
Washington, DC 20001

Contact:
David Karmol, dkarmol@iccsafe.org
Bruce E. Johnson, bejohnson@iccsafe.org

The International Code Council (ICC) offers the following comments on OSHA's proposal to extend the Office of Management and Budget's (OMB) approval of the information collection standards contained in the Portable Fire Extinguisher Standard (Annual Maintenance Certification Record) 29 CFR 1910.157 (e)(3).

It is the belief of the International Code Council (ICC) that the continued collection of this information is vital for ensuring worker safety through properly installed and maintained portable fire extinguishers in the workplace.

The ICC is a membership association dedicated to building safety, fire prevention, energy conservation and sustainability. The ICC develops the model building codes used to construct residential and commercial buildings and a model fire code to ensure buildings remain safe throughout their useful life. Most U.S. cities, counties and states that adopt codes, choose the International Codes (I-Codes) developed by the ICC. The I-Codes are currently adopted at the state or local level in all 50 States, the District of Columbia, Guam, Puerto Rico, the US Virgin Islands and the Northern Marianas Islands. It is the mission of the ICC to provide the highest quality codes, standards, products, and services for all concerned with the safety and performance of the built environment.

The ICC publishes the International Fire Code (IFC) which contains specific requirements for the installation, maintenance and inspection of portable fire extinguishers in accordance with

the National Fire Protection Association (NFPA) 704 standard, which is used to determine the fire risk of a structure. The standard is based on the fire load, the fire resistance of the structure, and the fire exposure of the structure. The fire load is the amount of combustible material in the structure, and the fire resistance is the ability of the structure to resist fire. The fire exposure is the amount of fire that the structure is exposed to. The standard is used to determine the fire risk of a structure and to determine the fire protection measures that should be taken to reduce the fire risk.

ICC also supports the use of technology to lessen the regulatory burden of inspection documentation and recordkeeping for portable fire extinguishers. The 2012 International Fire Code (Section 906.2 Exception 2) allows the use of a listed and approved electronic monitoring device (with specific reliability requirements), be permitted for supervising portable fire extinguishers and the elimination of 30-day inspections. ICC suggests that OSHA consider this technology application as a further amendment to the Portable fire Extinguisher Standard and the required recording keeping and information collection requirements under current regulations.