

Summary of Public Comments on March 2005 Draft Report of The Station Fire Investigation (4/18/05)

Date	Name	Organization	Comment (rec #)	Reference	Disposition
4/12	Dave Frable	GSA	Define "nightclub."	R1	
			Be specific on finish materials to be banned, and their characteristics	R2	
			What guidance should be provided for large-scale testing, who should develop info, who should pay?	R2	
			What is the technical basis for banning pyrotechnics in nightclubs below 10,000 sq. ft?	R2	
			Need to establish criteria (based on sound data) for exit number, location, and size.	R3	
			Elimination of "grandfathering" is better suited for performance-based codes, not prescriptive codes.	R4	
			Recommendation for redundancy is opinion, not based upon substantiation - should delete.	R5	
			How did location of portable extinguishers relate to current requirement? No technical substantiation.	R7	
4/12	Dave Johnston	BOMA Int'l	What constitutes a nightclub? Consider cost/benefits of sprinkler requirements.	R1	
			No basis for requiring additional egress safety factors when sprinklers are provided. 90 seconds is inappropriate trigger for requiring staff training.	R3	
			Rather than eliminating "grandfather" clause (which may infringe upon local law), requirements for existing and new structures should be specified (and may be the same)	R4	
			No substantiation provided for requiring redundant active/passive fire protection systems - delete.	R5	
			Objects to implication that entire model code framework is not credible.	R6	
			No indication that portable extinguishers could have been effective.	R7	
			Effective inspection is critical, and should be emphasized as top priority	R8	
			It is inconsistent to recommend adoption of increased firefighter staffing (1710) while pointing to the need for new tools to assist resource allocation; also, rapid growth of fire prior to arrival limited value of additional firefighters.	R9, R12	
4/11	Ron Geren	Gould Evans Assoc.	Common path of travel can be longer if areas serve less than 50 occupants.	ch. 7.3.10(vi)	Eric Mayle
			Not every exit needs to be separated from all other exists by 1/2 diagonal.	ch. 7.3.10(vii)	Eric Mayle
			<u>Clear</u> door width was only 33.5 inches, allowing only 167 occupants/door. Also, exit 2 stairs would accommodate 133 occupants, suggesting an overall egress capacity of 426.	Table 7-6	Eric Mayle
			NFPA 101: 12.2.3.3 and 13.2.3.3 also requires 50% egress capacity through main exit.	Table 8-3	check
			Triangle Shirtwaist Co. was of steel, concrete and masonry construction, not wood. Only interior construction was combustible.	C.3.4	check
4/6	Russ Fleming	Nat'l Fire Sprinkler Assoc.	Supports requirement for sprinklers	R1	no action
4/4	Bob Sweeney	RES Associates	Require public announcements of secondary emergency exits (as part of alarm).	R3	
4/4	Walter Adams	WBA Assoc.	Acknowledge that sprinklers fail to operate from 10% to 30% of the time, hence supporting need for passive fire resistance as a back-up.	R5e	
			Note that current IBC allows greater trade-offs for the use of sprinklers, moving away from redundant safety systems.	R3c	
			Require fire-resistance-rated wall systems to meet ASTM E119 single specimen test	R5	

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4/4	Carl Butzer	Jackson Walker L.L.P.	Add note E to Figure 6-12: "The diagram in Figure 6-12 is an approximation based upon the video available, and reflects approximate locations from where video was taken both before and during the fire. The video images in this Figure 6-12 were captured both before and during the fire."	Fig. 6-12	accept
4/1	Jan Seaman	Murray & Downs AIA Architects	Have exit signs contain a horn or other sound that is activated by smoke for people to follow when sign is obscured.	R3e	
4/1	Tassilo Baur	ASEPO	Replace "sparklers" with "sparks" or "spark effect discharge."	F and ch. 4	accept
			"Electrical match" should be "electric match".	p. F-1	accept
			Results of investigation do not support banning pyrotechnics from <u>(all)</u> buildings less than 10,000 ft2 (distinguish between indoor nightclubs and other occupancy uses, indoor and outdoor)	R2d	
			Results do not support requirement for having clearance from double the throw distance.	R2d	
			Ban is overly broad, penalizes those who are competent operators, and a code change, per se, would not have avoided a tragedy that resulted from ignoring the current code requirements.	R2d	
			Request statistical data be provided their organization that supports the 10,000 ft2 limit.	R2d	
			Bans on operation tend to drive illegal use underground. They should be avoided.	R2d	
			No mention was made of the role of the person responsible for initiating device, nor of officials responsible for inspection of building. Need to include statement like "the use of pyrotechnics in the nightclub was contrary to accepted professional practice, and that the disaster would not have occurred had those practices been followed."	R2d, R8	
			No members of the team were experts in pyrotechnics; hence recommendations outside of area of expertise and not specifically supported by conclusions should be withdrawn.	R2d	
3/31	Gary Keith	NFPA	Stress the need to comply with current 1126 (and that The Station did not).	R2d	
			2006 edition of NFPA 101 does increase exit capacity of main exit to 2/3.	R3b	
			Training of crowd managers in places of assembly is now a TIA, to be implemented in 2006	R3d	
			Requiring additional portable extinguishers had been examined and rejected in the past.	R7	
			Significant guidance for fire inspectors is already provided by NFPA. It may be possible to do more.	R8	
			Question the relevance of recommendations regarding fire service to investigation findings.	R9	
			Editorial comments	Exec Sum.	
			Editorial comment	1-7	
			Editorial comment	2-1	
			Corrections	3-2, 3-2	Kuntz
			There are inconsistencies between chp. 4 and chp. 7 in the location of the foam.	ch. 4, ch. 7	Bryner
			The sprinkler design was based upon the mock-up, not the full scale nightclub. Need to explain what the impact of increased spacing (4.6 m vs. 3.66 m) would have been.	ch. 4	Bryner
			How was water delivery density (4.1 mm/min maintained)?	ch. 4	Bryner
			Editorial comment	Fig. 4-42	Bryner
			Add "The listed activation temperature for all of the sprinklers used was 74 °C."	4-46	Byrner
			Extensive comments to be considered	ch. 5	Madrzykowski
			Extensive comments to be considered	ch. 6	
			Extensive comments to be considered	ch. 7	Mayl

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			Extensive comments to be considered.	ch. 8	
			Editorial comments	App. A-D, G	
3/29	Peter Tarlton	Wheelock, Inc.	Recommends use of voice evacuation system	R3	
3/25	Eileen & Al DiBonaventura	parents of victim	Ensure that future fire prevention measures are adhered to in RI; state needs strong guidance, and W. Warwick appears to be "above the law."	R1-R9	
			Employ best people to enforce code. Current fire inspector and State Fire Marshal are shielded from disciplinary actions.	R8	
			Communications among first responders needed improvement	R9b	
			It was reported that there was no water pressure.	ch. 3	
			Fire trucks were inadequately manned	R9a	
			There was not a uniform system of working together among fire departments	R9	
			National Guard provided 60 walkie-talkies for first responders, but these were not used.	R9b	
			Firefighters were not allowed to be interviewed for after-action report.	ch. 3	
			Some victim families and survivors were not sent letters inviting them to NIST briefing; no excuse since "they" (undefined) have complete mailing list. Also, not Senators nor Representatives attended briefing.		
3/24	Pat Jaufstetter	Fire Equip. Manufact. Assoc.	Strong supporter of requiring redundancy, and of requiring more portable extinguishers	R 5 and R7	no action
3/19	Craig Kampmier	citizen of Mass.	Brousseau is W. Warwick Chief of Police Department, not Fire Department.	p. 6-30 and refs[17, 18]	accept
			Correct the spelling of Marshal	p. 6-11	accept
3/18	Daniel Bak	MD Fire Safety	Would like to see input data files for FDS included in final report	ch. 6	
3/17	Forman Williams	AC	Need more background of polyurethane foam, and a summary of relevance to investigation	App. D.	Nelson
3/14	John Kempes	Celebration Fireworks, Inc.	Emphasize need for building owners to obey and local authorities to enforce existing statutes regarding use of pyrotechnics	R3	
			No justification for banning of pyros in buildings less than 10,000 ft ² .	R3	
3/14	Randall Davidson	Risk International & Assoc., Inc.	Supports recommendations regarding pyros, blocked exits, and flammable materials; some reservations about training staff for portable extinguishers.	R2, R3 R7	
3/5	Glenn Corbett	AC	Stress code enforcement as a major issue. Would like to see recommendation that state/local jurisdictions provide follow-up quality control inspections by senior inspectors.	R8	
3/4	Dave Collins	FAIA	Most significant finding was the serious breakdown of the process of governing such facilities through the regulations of building and fire codes in the community. Need to point this out, make it priority 1. Focus on adopting and enforcement agencies; model codes are not responsible to assure code enforcement officials are appropriately equipped.	R8	
			Stiffer recommendations regarding sprinklers and materials (and Pyros) would not have made difference in E2, or in The Station if the regs. were ignored. Irresponsible to indict all owners over this one incident.	R1, R2	
			Liquor licensing agency is logical place for improving communication with owner regarding fire safety issues.	R8	
			Questions logic for the 10,000 ft ² limit, and the ban in the first place.	R2d	
3/4	BillyG	The Secret List	Supports work that showed benefit of sprinklers.	R1	no action

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3/4	David Bibber	retired NH fire chief	Enforce the codes and standards that are already on the books.	R8	
			There should be an outright ban on pyrotechnics within NFPA 1126 in nightclubs, regardless of size	R2d	
			Supports crowd management training.	R3	
3/4	Henry Frank	private citizen	Supportive of work, refers to ProJo article with lead that "families react to report with mix of anger, hope; many are disappointed that the document holds no one responsible; others see it as leverage to get laws changed."	general	no action
3/3	Kathy Kondylas	NEVA Associates	Need to point out alternatives to flexible PU for sound absorption, suggests requiring color coding on foams to make inappropriate applications easy to spot	R3	