

VULCAN TECHNOLOGIES, INC

580 IRWIN STREET, SUITE 1

SAN RAFAEL, CA 94901

TEL (415) 453-1933

FAX (415) 459-6055

WWW.VULCANTECH.COM

FACSIMILE TRANSMITTAL SHEET

**TO: KEVIN REINERTSON, ACTING
DIVISION CHIEF**

FROM: ELISA TVAS

**COMPANY: STATE FIRE MARSHAL'S
OFFICE**

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RE: PROPOSED BUILDING CODE CHANGES

CC:

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November 13, 2009

David Wells, Executive Director
California Building Standards Committee
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Dear Mr. Walls:

Our company, Vulcan Technologies, Inc. was instrumental in the development of the two part vent test as set forth under the direction of the State Fire Marshal Kate Dargan and Assistant State Fire Marshal, now State Fire Marshal Tanya Hoover, we were directed to work closely with Emylee Chamblee and a number of specific individuals including Jim White and later Howard Stacy of Western Fire Center, the late Brady Williamson and Steve Quarles from the University of California, Deg Preist of Intertek (Omega) fire labs, Southwest fire labs and UL. In addition, other key fire scientists including Marcelo Hirchler and Vito Babrukas were also brought in to add input into the testing criteria. All of the above groups and individuals have, over the years been consultants to the Office of the State Fire Marshal. We are members of FVSA (Fire Vent Safety Association) and ASTM where we are working diligently to see that the vent testing criteria is implemented in ASTM standards.

The test criteria was mandated by the State Fire Marshal as there was a well recognized need to correct the existing fire problems being created by the standard 1/4" vents currently being used in the building industry. Ventilation of building structures is critical and cannot just simply be eliminated as other more serious problems would occur. The California wildfires have clearly shown that penetration of flames and embers into attics through existing vents have had a devastating effect.

In the course of the extensive testing performed on a vast number of screen sizes, we found that not only did the 1/4" vent screen fail both the flame and ember test criteria, the 1/8" screen performed just as badly, failing both testing criteria as well.

It is to be noted that the vents in a building structure are part of a system. We currently have WUI fire testing criteria for walls, eaves, decks, windows and doors. Having the proper vents with a viable test criteria and code implementation is integral to having the system work. As an example, the wall materials used on building structures are tested individually and time rated based on fire penetration through the wall with non treated wood siding and shingles being able to pass the test criteria (so much for the idea of non combustibility). In the real world walls have eave overhangs which will generate flashover at the eaves with the path of least resistance for flames to penetrate into the attic

being through the vents, thus the flame intrusion part of the vent testing criteria. Embers can and do fly through the air from great distances and have also been a source of home fire loss, thus the ember testing criteria. Vent screen size is critical to preventing ember intrusion into a structure.

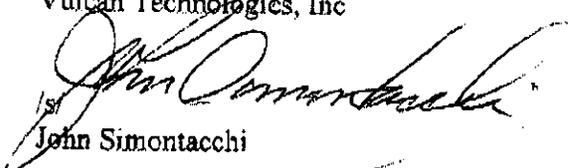
We have worked closely with the State Fire Marshals office on this issue for a number of years and more recently with code officials. Of major concern to me is the fact that there has been a clear reversal on the vent issue, deeming them unnecessary as standard vents are still viable. This is in direct contradiction to what the State Fire Marshal has initially directed to be done.

I would certainly like to understand why OSFM would change direction and what was the reasoning to weaken the code? Who came to the conclusion that virtually eliminating fire-safe vents that meet the test criteria that the State Fire Marshal required be implemented and now say that 1/8" vents are acceptable when the testing by many top fire labs and fire scientists used by the State say otherwise?

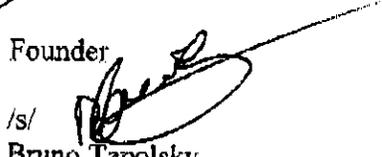
We are strongly against any weakening of the code, that the properly tested fire vents are a critical part of the system as previously stated and should have strong code underwriting. We ask that the proposed code not be implemented and in fact there is a need to have the code expanded to have all openings requiring ventilation within a building structure to be fire safe vents.

Respectfully,

Vulcan Technologies, Inc


/s/ John Simontacchi

Founder


/s/ Bruno Tapolsky
Chairman of the Board

Cc: Kevin Reinertson, Acting Division Chief, ✓
Code Development & Analysis, State Fire Marshal's Office