

The following is CALSAFE's "Readers Digest" version of the pending Sprinkler Fitters Regulation with comments. This package is in OAL and is expected to be approved for adoption. If approved by OAL, the regulation will take effect January 1, 2017. It is arranged differently from the actual layout of the regulation wording to clarify the requirements. Please note, that while this is a Sprinkler Fitters Certification regulation and is intended to only impact installations. However, CALSAFE believes the regulation, if adopted as it stands, will also impact on some companies who only do "maintenance and testing" under an OSFM A system's license.

SCOPE AND INTENT.

No person shall engage in the installation of water-based fire protection systems without first being certified or registered. Work consisting of installation, alteration or repair of all water-based fire protection systems. Water-Based Fire Protection Systems is defined as a system that includes but is not limited to a wet, dry, pre-action, and deluge fire sprinkler system, including small hose connections, standpipe systems, private fire service mains and their appurtenances, including hydrants and monitor nozzles, water spray systems, foam water systems, fire pumps, water storage tanks, low, medium, and high expansion foam systems, and water mist systems. The exceptions are one and two-family residential, underground water supply lines from the connection of the water supply to the first joint or mechanical connection at the base of the system riser and pre-engineered water-based fixed extinguishing systems.

CALSAFE Comment

The OSFM has stated that it is not the intent to require specialty contractors that only install items such as water storage tanks, tank heaters, fire pump and underground to be certified. We are not sure how they do that when this section clearly includes the installation of fire pumps and water storage tanks required certification. Where is "intent" defined?

Repair is to restore to normal working condition or to fix damage.

CALSAFE Comment

CALSAFE still find this definition troubling. The OSFM stated that the issue of repairs will be further addressed during the next regulatory action covering testing and maintenance. We are not sure what that means, are they planning on not allowing any repairs performed by maintenance technicians and if so what does that include? CALSAFE is still very concerned about what an inspection company will or will not be allowed to do.

An Apprentice is a person who is currently registered in a State of California or federally approved Fire Sprinkler Fitter Apprenticeship Program.

A Fire Sprinkler Fitter is a Certified Fire Sprinkler Fitter, fire sprinkler fitter apprentice, fire sprinkler fitter trainee or a Job Related Training and Experience Review (JRTER) participant

REQUIREMENTS FOR CERTIFICATION AND REGISTRATION

To be certified as a Fire Sprinkler Fitter an applicant shall meet the following requirements, be 16 years of age or older, provide one of the following; proof of completion of a State of California or federally approved apprenticeship program, or proof of a valid (C-16) License, or proof of JRTER certification, and pass a written examination.

Commercial Certification allows individuals to perform the installation of water-based fire protection systems in any occupancy. The Commercial Certification minimum qualifications are 7000 hours in a state or federally approved apprentice program, five (5) years' of experience within the scope of the regulations and the minimum hours as outlined or proof of SFM JRTER certification which is also 7000 hours and five (5) years' of experience. Applicants who have been certified but allowed their certification to lapse, shall provide proof of prior certification, and shall take an examination.

The Multi-Family Residential Certification is a certification allowing individuals to perform the installation of water-based fire protection systems in multi-family residential structures. The Multi-family Residential Certification minimum qualifications are 3500 hours in a state or federally approved apprentice program, two (2) years' of experience within the scope of the regulations, or proof of SFM JRTER certification which is 3500 hours and two (2) years' of experience within the scope of the regulations.

Employment experience and hours shall be provided in a letter(s) on company letterhead, from the applicant's current and/or former employer(s) certifying, under penalty of perjury, the applicant's experience and hours.

CALSAFE Comment

So if you have a fitter that has been with you less than 5 years and 7,000 hours, they will have to get verification from their former employer of the rest of their experience. This can be a problem if they did not leave on good terms or that company is out of business. There doesn't seem to be an alternative so they may be out of luck.

The Related Training and Experience Review (JRTER) is a means of validation for the purpose of certifying work experience and training hours of an individual performing the installation of fire suppression systems.

To be registered as an apprentice, an applicant shall meet the following requirements; be 16 years of age or older, provide proof of acceptance into a State of California approved apprenticeship program, provide proof of employment with a C-16 contractor and shall work under the direct supervision of a Certified Fire Sprinkler Fitter at all times.

A person not registered in a California State or federally approved apprenticeship program, shall be registered with the Office of the State Fire Marshal as a Fire Sprinkler Fitter Trainee and may work within the scope of these regulations as a trainee for up to one (1) year from their date of hire and then they must be registered into a California State or federally approved apprenticeship program. If the trainee is not accepted into a California State or federally approved apprenticeship program

within one (1) year of their date of hire the individual shall no longer be registered to work on water based systems. Individuals may perform work within the scope of the regulations for no more than ninety (90) days prior to submitting an application to the OSFM. To be registered as a trainee, an applicant shall be 16 years of age or older, provide proof of employment with a C-16 contractor and work under the direct supervision of a Certified Fire Sprinkler Fitter at all times.

CALSAFE Comment

This provision allows a new employee to be registered as a Trainee for a period of one year. While a trainee is not required to register in the first 90 days the trainee will have be registered to continue to work after that and upon reaching their one year anniversary the technician either has to be registered in an apprentice program or cannot continue as a Fire Sprinkler Fitter.

A Certification or Registration Card shall be carried with the individual.

Certification or registration shall be valid from the date of issuance through June 30th. Thereafter, each certification shall be renewed annually and is valid from July 1st through June 30th. Application for the renewal of an Apprentice or Trainee Registration or a Certified individual, which has expired, shall be considered an original application and the applicant is required to comply with all requirements of an original application.

Every three (3) years at the time of renewal, proof of the certified applicant's Continuing Education Units (CEU) shall be submitted and reviewed. The three (3) units has to be State Fire Marshal approved continuing education and must be completed within the three (3) year period verified by the Office of the State Fire Marshal. If it is determined the applicant has not satisfied the required minimum CEU, the application for renewal shall be rejected. If proof of compliance is not received at time of renewal on the third year of the three (3) year period, the Certified Fire Sprinkler Fitter shall be required to re-apply as a new applicant. The certified applicant shall complete additional continuing education to meet the required minimums before reapplying for certification and must then successfully pass a written examination.

All CEU training courses shall be registered and listed with the OSFM and shall be located on the OSFM website.

CALSAFE Comment

This is one that must be carefully monitored. If your fitter fails to keep up on the CEU's (and remember they have to be OSFM authorized training to qualify) you may have a twofold problem. They have to make up the CEUs and if not done before the expiration of that current license for the third year they will have to reapply which means they will have to also take a test. In the meantime, they cannot not work because they have an expired certification.

The properly licensed contractor performing installation of water-based fire protection systems shall ensure all fire sprinkler fitters under their employment are certified or registered. The licensed contractor shall notify the Office of the State Fire Marshal in writing within seventy-two (72) hours from the date of hire of an employee's status as a trainee, apprentice or certificate holder

CALSAFE Comment

Note this is not the normal 7 or 14 days in other regulations. It is 72 Hours!

A Certified Fire Sprinkler Fitter may supervise the number of apprentices permitted in their Apprenticeship Agreement and up to two (2) trainees. Those who are not in a California State or federally approved apprenticeship program may supervise three (3) JRTER participants.

ENFORCEMENT AND PENALTIES

The SFM, SFM Designee or AHJ, is authorized to inspect project worksites where work on fire protection systems is being performed to ensure that persons performing the work possess valid certifications or registrations. Violations are subject to a Notice of Violation or Correction Order.

If the SFM, SFM Designee or AHJ determines that the installation of water-based fire protection systems is being performed in violation of this Chapter and after providing reasonable notice in accordance with Section 928, he or she is authorized to issue a "Stop Work Order" as defined in Title 24, California Code of Regulations, Part 9.

CALSAFE Comment

CALSAFE is concerned on how the Stop work order would be invoked by the AHJ. It could be a very costly process to not only the contractor but all involved with the job especially if it is not done for the authorized reasons or the proper procedures are not followed.

ALTERNATIVE PATH FROM APPRENTICESHIP

The SFM JRTER is intended to meet or exceed the hours of the California State or federally approved apprenticeship programs. Applicants shall meet the minimum hours and subjects required to complete the SFM JRTER and qualify for certification

For Commercial Certification as follows:

A total of 7,000 hours and 5 years is required.

- (1) 4000 hours of Installation of Overhead Piping in the following areas: Wet Pipe Systems; Pipe Cutting, Welding, Threading and Grooving, Fittings, Valves, Hangers, and Seismic Bracing and Restraints; sprinklers, Applications, and Operations; Copper Soldering and Brazing; or other areas as approved by the OSFM.
- (2) 350 hours of Installation System Controlling Valves, Controlling Devices, Alarms and Specialty Systems in the following areas: Dry Pipe Systems Pre-action Systems Combination Dry Pipe Pre-action Systems Antifreeze Systems Deluge Systems Circulating Closed Loop Systems Multi-cycle Systems Water Mist Systems Foam Systems Backflow Prevention Fire Alarm Signaling Systems associated with Water-based Fire Protection Systems; or, Other areas approved by the OSFM.
- (3) 700 Hours of Installation of Fire Service Supply in the following areas: Fire Service Mains, Fire Pumps, Tanks, Environmentally Friendly Practices (water recovery/de-chlorination); or, other areas as approved by the OSFM.
- (4) 700 Hours of Applicable Standards, Plans, Drawings, & Green Practices in the following areas: Applicable Installation Standards, Trade Math, Isometric Drawing, Reading Sprinkler &

Architectural Plans, Economics of the Sprinkler Industry (material efficiency - waste reduction), Green Practices, Water Control and Recycling, Material Efficiency and Recycling, Waste Reduction, Introduction to the Leadership in Energy and Environmental Design Program Operation and Maintenance Optimization; or, other areas as approved by the OSFM.

- (5) 700 Hours of Repair, Alteration, Inspection, Testing and Maintenance in the following areas: Inspection, Testing and Maintenance; Environmentally Friendly Practices; or, other areas as approved by the OSFM.
- (6) 250 Hours of Safety in the following areas: Trade Safety, 10 Hour OSHA and Motorized Lift Equipment Safety Training, CPR/First Aid, Knot Tying and Rigging, Tools of the Trade, Human Relations/Foremanship, Training in Excavation and Trenching; or, other areas as approved by the OSFM.

For Multi-Family Residential Certification as follows:

A total of 3,500 hours and 2 years is required.

- (1) 2,000 hours of Installation of Overhead Piping
- (2) 300 hours of Installation of System Controlling Valves, Controlling Devices, Alarms & Specialty Systems
- (3) 200 hours of Installation of Underground Piping/System Supply Piping per the California Plumbing Code
- (4) 100 hours of Installation of Fire Service Mains per the California Fire Code
- (5) 200 hours of Applicable Standards, Plans, Drawings & Green Practices
- (6) 300 hours of Repair, Alteration, Inspection, Testing & Maintenance
- (7) 200 hours of Safety

The additional hours required to make up the minimum hours and years can be from any of the categories. Proof of the minimum hours in accordance with Section 945(c) shall be provided by the JRTER participant.

CALSAFE Comment

The way that the JRTER language is written it is meant to be an on the job training path that someone can go through instead of an apprenticeship program. The reporting form allows for both classroom and on the job training to be reported.

IMPLEMENTATION PERIOD AND HISTORICAL RECOGNITION.

- (1) Historical Recognition:
Journeyman Fire Sprinkler Fitters, or those who possess an active (C-16) License who meet the requirements within one hundred eighty (180) days of the effective date of this Chapter, shall not be required to take an examination.
An application for certification shall be accompanied by the following documentation for the applicant to meet the minimum qualifications.
 - (i) Commercial: 7000 hours verified work experience, and five (5) years' working within the scope of the regulations.
 - (ii) Multi-family Residential: 3500 hours verified work experience and two (2) years' working within the scope of the regulations.

The employment hours shall be verified by letter on company letterhead certifying the experience and hours from the fire sprinkler fitter's employer or an alternate method approved by the Office of the State Fire Marshal.

CALSAFE Comment

There is an inconsistent issue with the way this part of the regulation is written. This is supposed to be a "grandfather" type provision. The verification of hours for the Multi-Family certification is to be in a letter on company letterhead but there is not similar language on the Commercial Certification. It is possible that the commercial experience may have to be verified using the JRTER path which will cost an additional \$500 and time to process that information. We must wait and see if they require that because on that form it requires the past 10 years of work history to be verified not just the last 5 years. PAY CLOSE ATTENTION TO THE FACT THAT YOU ONLY HAVE 180 DAYS FROM JANUARY 1 2017 TO TAKE ADVANTAGE OF THIS "GRANDFATHERING" PROVISION. AFTER THAT IT WILL INVOLVE BEING A GRADUATE OF AN APPRENTICESHIP PROGRAM OR ENROLLING IN THE JRTER PROGRAM - AND IN EITHER CASE REQUIRING THE CONTRACTOR OF FITTER TAKING A TEST.

CALSAFE also points out just even though someone has qualified for a C-16 license they will still have to qualify for a OSFM certification with both the work experience and testing in order to perform the work they are licensed for.

- (2) No certification card shall be required within one (1) year, (365 days) of the effective date of this Chapter.

CALSAFE Comment

There appears to be at least some delay in the requirement of cards in the field, however don't forget you only have half of that time to take advantage of the grandfather clause. You not want to come to the end of the year period and not have certified fitters. The problem will also be whether there is any delay by the OSFM for issuing registrations. Your apprentices and trainees will have to be registered immediately and since they have to be supervised by a "certified" fitter, you will not be able to use them on the job until you have certified fitters in place.

- (3) Commencing on the second (2nd) year (366th day) of the effective date of this Chapter there shall be a minimum of one (1) certificate holder certified on each job site.

CALSAFE Comment

While this seems like a second year to "ramp up" it is not a full year since all this section disappears after 18 months. This 2nd year is only 6 months of a second year. Also, remember that this applies to certification cards only. There is no "grace period" for registration cards, so the requirement for apprentices and trainees are immediate. That also means they must work under the direct supervision of a certified fitter. If you are using apprentices and trainees there doesn't appear to be a real staged implementation period.

- (4) Commencing on the 18 month (545th day) of the effective date of this Chapter all persons on the jobsite performing installation, alteration or repair of water-based fire protection systems shall possess a certification or registration card.

CALSAFE Comment

These are the major components of the regulation that will impact your business if you are performing any type of sprinkler work installation or maintenance. Don't miss the fact that repairs associated with maintenance is a part of this requirement. It is expected to be in OAL for 30 days which is until the middle of November and the OSFM expects to have it effective January 1, 2017. CALSAFE urges all embers read the regulation thoroughly to get ready for the likely bumpy ride ahead.

TABLE OF FEES

(1) Sprinkler Fitter Certification	\$150
(2) Apprentice Registration	\$150
(3) Trainee Registration	\$150
(4) Annual Renewal	\$150
(5) Replacement Certification or Registration Identification Card	\$25
(6) Commercial Continuing Education Unit Course Registration	\$150
(7) Multi-family Residential Continuing Education Unit Course Registration	\$150
(8) SFM Job Related Training and Experience Review (JRTER)	\$500