

Mr. Narva,

Relative to the request for comments to the NASFM Bulletin of September 2008 “Pallet Fire Loading Impact on Sprinkler Design”, please accept and consider my comments as a non-fire science engineer, rather as a practical business operator who uses a small quantity of plastic pallets for internal transport of manufactured products.

Gentlemen:

No where in the Bulletin do I see any reference to qualify the gross volume of ‘plastic’ relative to any cubic footage of building area. I also do not see any reference to a quantity of plastic pallets that would/might be considered a quantity that would have “minimal impact” – therefore non considerable in a sprinkler density design.

As an example: a 200’000sf facility with 20ft ceiling height that might have 150 42” x 48” plastic pallets in total – and only (say) 40 of those stored for use in several stacks each stack 5ft high - would be reasonable, and would have a negligible impact on an existing sprinkler system design.

This type of factoring’ and scenario should qualify for an exemption.

Likewise ‘requiring’ UL or FM labeling on pallets – again in our opinion creates a financial hardship to a business owner/operator. “My pallets that we ‘OK’ for use for the last 10-years, up to today, might now become ‘out of compliance’ and require me to pay 200\$ per plastic pallet – rather than 60\$ per plastic pallet.

As a business operator, I feel that there ought to be fair and reasonable regulations for all fire safety regulations. I believe that FM Global ought to present opinions and advise that are consistent with good engineering principles while being logical in their application and applicability.

I appreciate this format that allows comments.

Sincerely,

Richard A. Monteiro
10 October 2008