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National Association of State Fire Marshalls
1319 F Street, N.W., Suite 301
Washington, DC 2000

Re: Pallet Fire Loading Impact on Sprinkler Design

To whom it may concern:

As a professional representative of Loss Control and Risk Management in the insurance industry, I welcome the educational opportunity proposed by the National Association of State Fire Marshals on warehouse pallets. I have been involved in risk and hazard assessment dealing with wood and plastic pallets for several years now and still find the exposure identification somewhat confusing. The NASFM Code Application Bulletin provides me and my clients a clear path to audit, evaluate and remediate a potentially hazardous situation which is extremely critical for exposure evaluation purposes.

My experience with this issue is that if ignored it can create a very high uncontrolled exposure hazard. While plastic pallets have gained much notoriety as a potentially high fire and life safety exposure, little attention has been given to their wooden counterparts. My guess is that people are complacent about wood pallets due to their familiarity with them and the false comfort people have with wooden products in general. It is also a known fact that wooden pallets represent a very high fire exposure hazard. The code requirements on NFPA 13 are little known within the industry, likely due to the lack of interest the industry has in highlighting their true hazard.

We welcome the opportunity to educate our industry and to educate our clients of these hazards. Showing the actual fire performance differences between all types of pallets is very compelling. This clearly points to a need to understand and manage this high exposure hazard.

We are also puzzled by NASFM's delay in getting this information out to all code and enforcement authorities. Of greater concern is the apparent compromise made at the request of CHEP, a prominent industry supplier, to delay pallet education. As far as we are aware, NFPA 13 is in effect and all that NASFM is proposing to do is to educate their membership about these codes. Isn't this one of the primary functions of NASFM? **Having NASFM and NFPA behind our message lends credibility to the issue - bending to a particular industry interest destroys that credibility.**

We look forward to the rollout of this much needed industry education and awareness.

Sincerely yours,