



NFPA 13R

5.4.2

APPA disagrees with adding a trust heat trace to prevent freezing. It has a habit of failing regularly and without warning. We agree with Technical Committee member Peter T. Schwab's Affirmative with Comment, "The committee statement would make excellent annex language because it indicates that the temperature of the space that the wet pipe is installed can get below 40 degrees as long as the pipe does not freeze." We are asking the technical committee to review this subsection to ensure it is enforceable.

10.3

APPA disagrees with the proposed language that adds a risk management assessment for the storage of combustibles without further explanation as to when and who will do the risk management assessment.