

Public Hearing for the Proposed Fire Suppression Program
Rule Changes as Pertaining to Backflow Testers
Submitted By Charlie Sullivan

On May 8th, 2006 I attended a public hearing with Larry Nelson to review the proposed changes to the Colorado Division of Fire Safety's Registered Fire Suppression System Contractor registration requirements, other items were discussed at the meeting, everything here in pertains to the issues around the backflow industry As proposed at this time all backflow technicians that would be testing a backflow prevention device or repairing a backflow prevention device on a fire line will be required to register with the Colorado Division of Fire Safety as a Registered Fire Suppression System Contractor-Backflow.

The proposed procedures for registration- Backflow contractors would be as follows:

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- 3.6.1 In order to become registered as a fire suppression contractor-"Backflow", the applicant must provide the administration with the following documentation.
- 3.6.2 The applicant is a principal of the company as defined in the Colorado Revised Statutes 24-33.5-1202 (8) and the company shall be recorded with the Colorado Secretary of State's Office.
- 3.6.3 The contractor must complete all parts of the application and sign it. The "Application for Registration" is an official document legally binding the contractor to the provisions of the Colorado Revised Statutes and all the rules adopted by the administrator that pertain to the installation of underground fire lines.
- 3.6.4 The contractor must provide documentation that he / she is certified as a Cross-Connection Control Technician and must possess a valid certification from the American Society of Sanitary Engineering (ASSE), the American Backflow Prevention Association (ABPA), or the Association of Boards of Certification (ABC), in conformance with requirements set forth by the Colorado Primary Drinking Water Regulations.
- 3.6.5 The contractor must obtain liability insurance related to the industry. The documentation submitted must include inclusions and exclusions of coverage.
- 3.6.6 The registration is valid from the time of issue to December 31st of the current year, unless earlier revoked or suspended. It must be renewed annually, on or before January 31st of each year.

The discussion on the matter revolved around whether or not continuing education units (CEU's) would be required when registering for Registered Fire Suppression System Contractor- Backflow. At this time they are not going to require this and will instead add a requirement stating to the affect that anyone registering will need to state that they have knowledge of the proper procedure on how to properly take the fire sprinkler system and the fire alarm system out of service for the backflow test and putting the systems back into service at completion of backflow test, knowledge of the requirements in N.F.P.A. 25, Standard for the Inspection, Testing, and Maintenance of

Ware-Based Fire Protection Systems pertaining to the testing of backflow prevention devices, and a basic knowledge of both systems and how to proceed if any complications were to arise, i.e. tamper switch not resetting, fire alarm system not restoring, accidentally tripping a dry pipe or pre-action/deluge system. The committee felt this would best cover the Colorado Division of Fire Safety's interests by putting the accountability issue back on the registered contractor who will be signing a legally binding document stating he / she has such knowledge.

This approach will allow the certified backflow testers to develop a training process that would stay industry specific and allow the industry to monitor the training process that will need to be put into place. There is always the chance that in the future the continuing education units (CEU's) could be implemented. The development of a program at this time and getting it accredited now will save the industry any problems in the future, such as another entity imposing a program on us, which may be more stringent than it needs to be.

Also discussed was the matter of insurance requirements, what is unclear at this time is the impact that may be felt by testers who find that they in fact do not have proper insurance coverage to be working with fire protection equipment and what the financial impact may be as a result. The committee agreed to investigate this further with several members stating that they would call various insurance carriers to find out what type of impact the industry might expect. All in attendance did tend to agree that by working on a fire line backflow the same level of liability exists for the Registered Fire Suppression System Contractor- Backflow just as it exists for the Registered Fire Suppression System Contractor and all agreed that this is generally more of a cost burden.