

The Florida Fire Marshals and Inspectors Association, "Organization" (§633.026)

#### **Informal Interpretation**

Request
Date: 01/02/24

NFPA Document No. that is the subject of the question: **NFPA 101 Life safety.** Edition of the NFPA Document: **2018**Chapter and Paragraph of the NFPA Document: **Chapter 15.2.2.4** 

### Explain how the Petitioner's substantial interests are being affected by the question below:

Because it is rare for any door barricade system to meet life safety standards, when we call upon potential clients about our Rhinoware door barricade system, the potential clients typically respond with, "Our Fire Marshal will not approve any door barricade system". This response comes prior to them seeing or learning about our product. The comment is based on fear of investing funds and having the Fire Marshal require the tool's removal after the investment is made. This is impeding our business interests by inserting a significant hurdle in bringing our product to market. In addition, schools, businesses, and places of worship are looking to add levels of security to their facilities, and with door barricade systems having a blanket assumption of 'noncompliance' it is preventing them from adding this layer of safety for their staff, children, members, and visitors. Finally, most potential clients are unfamiliar with the fire codes and therefore the demonstration of the features that do ensure compliance with NFPA 101

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675



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does not ease their concern about purchasing the product. **I am confident this** informal interpretation will help potential clients feel more comfortable and confident to ask their Fire Marshal if Rhinoware meets the NFPA 101 codes, thus reducing the barrier in our business efforts, which will expedite this layer of safety in our communities. I feel it will also help the fire community recognize that we are respectful and responsive to the fire codes to ensure we are bringing safety and value, with compliance.

#### Enter the Petitioner's question concerning an interpretation of the FFPC:

Does Rhinoware Door Lockdown system version 4 meet NFPA 101 codes? (Please review the video demonstrations of the specific codes.) <a href="https://bit.ly/46LQIx4">https://bit.ly/46LQIx4</a>

#### **Committees Answer:**

Yes,

As the Florida Fire Prevention Code intent is to protect from dangers to life from fire (NFPA 101 1.1.2) and to establish minimum criteria for the design of egress to allow prompt escape for occupants (NFPA 101 1.1.3) it also addresses considerations that are essential to life safety in recognition of the fact that life safety is more than a matter of egress (NFPA 101 1.1.4). With this in mind, although active shooter and other similar events are not addressed directly in the life safety code they have become a major Life Safety consideration to be factored in for educational and other at-risk occupancies. It is our opinion that the "*rhinoware door lockdown*" as

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shown and demonstrated by literature and video meets the following life safety Code requirements.

- The unlocking and unlatching from the classroom side of the door can be accomplished without the use of a key, tool, or special knowledge or effort. 2018 NFPA 101 15.2.2.2.4 (1)
- The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor. Alternative designs, products or technologies may be used, provided they result in substantially equivalent or greater accessibility and usability. 2018 NFPA 101 15.2.2.2.4 (2)
- The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential. 2018 NFPA 101 15.2.2.2.4 (3)
- The locking means shall not modify the door closer, panic hardware, or fire exit hardware. 2018 NFPA 101 15.2.2.2.4 (4) (\* see Note below)
- Modifications to a fire door and fire door assemblies, including door hardware, shall be in accordance with National Fire Protection Association (NFPA) 80: Standard for Fire Doors and Other Opening Protectives (2010). 2018 NFPA 101 15.2.2.2.4 (5)

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877.461.8378 ph. | 604.527.8368 fx. 909.483.0250 ph. | 909.483.0336 fx. 540.636.9445 ph. | 540.636.9414 fx. VANCOUVER, BC: LOS ANGELES, CA: WASHINGTON, DC: 918.437.8333 ph. | 918.437.8487 fx. TULSA, OK: TORONTO, ON 416 550 9280 WEBSITE: WWW.QALORG

#### FIRE DOOR LISTING PROGRAM

Customer: Campus Safety Products, LLC

Class: Fire-Resistant Door Hardware Component

Location: Durham. North Carolina

Website: www.campussafetyproducts.com

Listing No. F454-1

Project No. F454-1 Edition 2

Effective Date: December 18, 2018 Last Revised Date: November 28, 2022

> Standards: UL 10B Fire Tests of Door Assemblies

> > **UL 10C** Positive Pressure Fire Tests of Door Assemblies NFPA 252 Standard Methods of Fire Tests of Door Assemblies CAN/ULC S104 Standard Method for Fire Tests of Door Assemblies

Product: Fire-Resistant Door Hardware for use with Neutral & Positive Pressure Rated

Category "A" and "B" Fire-Resistant Doors.

Markings: See FD001 - Fire Door Labeling requirements

Models:

| Product<br>Name(s)   | Door<br>Skin<br>Type | Door Core<br>Type           | Maximum<br>Fire-resistance Rating |
|--|----------------------|-----------------------------|-----------------------------------|
| RhinoWare® Door<br>Barricade Devices<br>RW3000/RW4000<br>RW3000-CL/RW4000-CL | Wood                 | Solid Wood /<br>Composite   | 20 Minute                         |
|  | Steel                | Hollow /<br>Steel Stiffened | 90 Minute                         |

Notes: The listing noted pertains to RhinoWare® Door Barricade Device intended for use with door products in fire-resistance rated applications. Where openings have additional criteria beyond the scope of fire-resistance rating, the Authority Having Jurisdiction (AHJ) should be consulted for approval of RhinoWare® Door Barricade

Product is to be installed in accordance with the manufacturer's installation instructions strictly by installing personnel that is qualified by Campus Safety

Refer to the FD002 - Fire Door Guidelines for general guidelines of fire door assemblies.

The materials, products or systems listed herein have been qualified to bear the QAI Listing Mark under the conditions stated with each Listing. Only those products bearing the QAI Listing Mark are considered to be listed by QAI. No warrantee is expressed or implied, and no guarantee is provided that any jurisdictional authority will accept the Listing found herein. The appropriate authorities should be contacted regarding the acceptability of any given Listing. Visit the QAI Online Listing Directory located at www.qai.org for the most up to date version of this Listing and to validate that this QAI Listing is active. Questions regarding this listing may be directed to info@qai.org. Please include the listing number in the request.



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Note: \* Rooms or areas that are required to have panic hardware due to occupant load requirements would not be compliant with Florida Fire Prevention Code.

**Region 1** - Delegate: Byron Bennett, North Bay Fire Control District Alternate: William (Michael) Hall, Marianna Fire Rescue

**Region 2** - Delegate: Jason R. Greisl, Tallahassee Fire

Alternate: Vacant

**Region 3** - Delegate: James Groff, Jacksonville F. R. (Committee Chair)

Alternate: Silver Chip Ware

Region 4 - Delegate: Taylor Riley, Lakeland Fire Rescue

Alternate: Karl Thompson

Region 5 - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department

Alternate: Christina Diaz, Seminole County Fire Department

Region 6 - Delegate: Robert Salvaggio, Cape Coral Fire Rescue

Alternate: Vacant

**Region 7** - Delegate: (Kenneth) Sean Brown, Broward Sheriff Fire Rescue & Emergency Services

Alternate: Rebecca Geimer Tamarac Fire Rescue



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