The Requirements for Water Based Fire Protection Inspection, Testing and Maintenance, Under Earlier Design Criteria
California Code of Regulations Title 19/NFPA 25, 2006 California Edition

Question 1. Some systems or portions of systems are not testable to the standard. Are the systems considered deficient until they are made test-ready and pass? Is a test required if the installation, as it exists, is not conducive to testing?

Example: pressure reducing sprinkler control valves. NFPA 25, 2006 California Edition Section 12.5.1.2 tells us that a full flow is required. It involves measuring pressure on the inlet and outlet side of each valve. Most control valves are not equipped with gauges. Should we install gauges to test, or not test at all?

Answer: No. There are no requirements to install gauges. Title 19 Section 904.2 (b) Any testing and maintenance of automatic fire extinguishing systems shall be performed in accordance with these regulations.

EXCEPTIONS:
1) The State Fire Marshal may waive in writing the requirement that testing and maintenance be performed in accordance with these regulations when a licensee can demonstrate that a system cannot functionally be tested and maintained in accordance with the requirements in these regulations.
2) If at any time a licensee encounters a specialized or modified system which cannot be tested and maintained according to these regulations, the licensee shall contact the State Fire Marshal and test and maintain the system as directed.
   (A) The intent of this section is to cover automatic fire extinguishing systems as originally designed, installed and approved by the Authority Having Jurisdiction. It is not, however, intended to require that such systems be upgraded to current adopted standards.

Additionally, the local Authority Having Jurisdiction should be consulted to determine requirements for testing, and refer to NFPA to obtain the most appropriate edition for the original system installation.

If you have further questions, please contact Supervising Deputy State Fire Marshal James Parsegian at james.parsegian@fire.ca.gov or (916) 445-8415.

For more information please visit our website http://osfm.fire.ca.gov