



## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

FIRE SAFETY CODE  
BOARD OF APPEAL AND REVIEW  
1 Regan Court  
Varley Building #46  
Cranston, RI 02920

Office (401) 462-0940  
(401) 222-3473  
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711 (TTY)

**DECISION****MUNICIPALITY: North Smithfield****FILE NO.: 100211****LOCATION OF PREMISES: 575 Smithfield Road****APPLICANT: Town of North Smithfield  
P.O. Box 248  
Slatersville, RI 02876****USE OR OCCUPANCY: Business**

The above-captioned case was scheduled for hearing on October 5, 2010 at 1:00 P.M. At that time, Acting Chairman Newbrook and Commissioners Blackburn, Filippi, Dias, Richard and Preiss were present. The fire service was represented by Assistant Deputy State Fire Marshal Brian Gartland of the North Smithfield Fire Marshal's Office. A motion was made by Commissioner Richard and seconded by Commissioner Filippi to grant the Applicant relief as outlined herein. The motion was unanimous.

### **FINDINGS OF FACT**

The numbers of the Decision below correspond with those of a July 20, 2010 inspection report compiled by the North Smithfield Fire Marshal's Office. The above report was utilized by the Board, the Applicant and the North Smithfield Fire Marshal's Office during the October 5, 2010 hearing on this matter. Accordingly, the Board hereby incorporates the July 20, 2010 inspection report as its initial findings of fact. Any modification of the Board's findings, such as correction of a deficiency by the Applicant, shall be noted herein.

Any deficiency understood by the Board to have been corrected, which is not so corrected, shall be immediately corrected by the Applicant. The term "approved", as used herein, is understood to mean "in accordance with the specific provisions related to the particular subject as are contained in this Code, or as approved in particular by the State Fire Marshal or his or her designee".

### **CONCLUSIONS AND VARIANCE REQUESTS**

1. The Board hereby grants the Applicant a time variance of thirty (30) days from the date of this decision in which to correct deficiency 1 by repairing the cited exit light in the workout room (rear exit of this facility).

2. The Board hereby grants the Applicant a time variance of thirty (30) days from the date of this decision in order to allow the Applicant to provide approved fire detection equipment (smoke detectors) in the workout room and town offices on the annex side of this building.

3. During the October 5, 2010 hearing on this matter, the Board was advised that the Fire Marshal had determined that the prison holding areas (cell block) in the basement of this facility are not covered under the existing business occupancy chapter of the fire code, and are therefore non-compliant. The Board hereby grants the Applicant a variance in order to utilize the 2009 edition options outlined in section 23.4.5.1.4 and 23.4.5.2 as alternative means of compliance with the code. The Board notes that under the above provisions, call-back is acceptable as long as it can be effected within two (2) minutes of the alarm. In granting this relief, it is the understanding of the Board that the Applicant does not have reserve officer capacity or a special officer who could be delegated this assignment. Finally, the Board hereby grants the Applicant a time variance of thirty (30) days from the date of this decision in which to address this situation with the North Smithfield Fire Marshal's Office.

4. It is the understanding of the Board that the Applicant has corrected deficiency 4 by providing the cited portable fire extinguishers with approved certification.

#### **STATUS OF DECISION AND APPEAL RIGHTS**

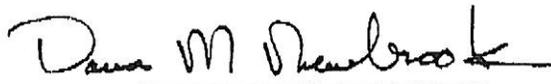
This Decision represents a comprehensive, integrated plan of fire safety for the above-captioned facility under the above-cited use or occupancy. Accordingly, every variance granted is conditioned upon the Applicant's timely and continued compliance with all of the directives of the Board. Every variance granted is further conditioned upon the continued use or occupancy of this facility under the above-cited classification reviewed by the Board. (See: Board Rules and Regulations, section 6-2-17).

Failure of the Applicant to initially comply with the full Decision of the Board, within the stated time frame, shall void all variances granted herein. (See: Board Rules and Regulations, section 6-2-18.) In the event of complete, timely and continued compliance with the full Decision of the Board, the above cited variances shall be deemed to have vested in the above-captioned facility. As long as this facility is in continued compliance with the full Decision of the Board, the above-cited variances shall remain with this facility in the absence of any change in use or occupancy mandating review under a separate classification of the Fire Code or a revision of the above-cited classification. (See: Board Rules and Regulations, section 6-2-19).

Such changes in use or occupancy of this facility, or failure to continually comply with the Board's Decision shall void all variances granted under the above-cited use or occupancy. If such change creates a new use or occupancy as outlined in R.I.G.L. 23-28.1-6, all variances granted under the original use or occupancy are void and this facility shall be reviewed under the newly created use or occupancy. (See: Board Rules and Regulations, section 6-2-20).

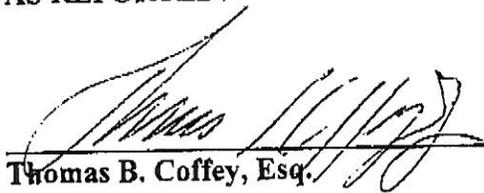
**The Applicant may appeal the Board's Decision, within thirty (30) days of the mailing date of this Decision, by commencing an action against the State Fire Marshal in the Sixth division of the District Court. Commencement of such an action does not operate as an automatic stay of this Decision [R.I.G.L. 42-35-15(c)].**

**FIRE SAFETY CODE  
BOARD OF APPEAL & REVIEW**



**Dana M. Newbrook  
Acting Chairman**

**AS REPORTED:**



**Thomas B. Coffey, Esq.  
Executive Director**

**100211**

**Mailing Date:** 12-16-10

**cc: Applicant  
North Smithfield Fire Department  
State Fire Marshal's Office**

TC/cm



# North Smithfield Fire & Rescue Services, Inc.

675 St. Paul Street  
North Smithfield, RI 02896



## Office of Fire Prevention

Joel D. Jillson  
Fire Chief

Brian Gartland  
Fire Marshal

Voice (401) 356-4355  
Fax (401) 356-0851

## Notice

**Date:** July 20, 2010

**Building Owner Name/Address:**  
Town of North Smithfield  
1 Main Street  
North Smithfield RI 02896

**Site #:** 767-2201

**Occupant:** Town Annex/Police Department

**Location:** 575 Smithfield Road

**File #:** 10-71

**Inspection Date:** July 20, 2010

**FDID #:** 02501

**Compliance Date:** 30 Days from signed copy

**Inspected By:** Brian Gartland, ADSFM

**Basis for Inspection:** Fire Safety Code Compliance

**Any violation, deficiency or requirement, which may have been overlooked in the course of this Inspection, is also subject to correction under the provision of any applicable code.**

If you feel that there will be practical difficulties in correcting the violation or if for any reason you wish to have a hearing on the violation, you may apply in writing to the State Fire Safety Board of Appeal and Review. Applications for variations are done on a separate form available from this office. Request for variation or hearing before the Fire Safety Code Board of Appeal and Review must be submitted within thirty (30) days of the receipt of this notice. Failure to apply within the thirty (30) day period will cause this notice to become a compliance order and will subject you to prosecution under the Rhode Island State Fire Safety Code should you fail to correct all of the violations noted in the enclosed report.

### **Building Description/Details**

This facility has been inspected using the 2003 editions of the Rhode Island Life Safety Code and the Rhode Island Uniform Fire Code.

This structure is 2 stories in height (split level) and can be classified as type 3 construction. This building was built in the late 1920's for the use of a school. In the late 1980's the building was converted into town offices and a police station (Business Occupancy). The first floor (left side) is occupied by the Town Clerk, Tax Assessor, and Tax Collector offices. The first floor (right side) is the Police Department. The basement has locker rooms, workout room, evidence room, interrogation room, interview rooms and 3 holding cells for prisoners. All areas of the building have the proper amounts of egress with the exception of the cell block area. Because the building is split level, basement egresses on side 3 discharge directly to the outside at grade. Total building square footage is 11,181.

Heat for the building is provided by a furnace fueled by natural gas. The furnace is inspected and maintained and in good working order.

This building has a municipally connected fire alarm system (Box #12) with pull-stations, horn/strobes, smoke detectors, and heat detectors. The fire alarm system is not compliant with current fire code with regards to wiring, however the system is tested and maintained and in good working order. This building also has exit signs, portable fire extinguishers, and an emergency generator. The FACP is located in the main entrance of the Police Department. Keys for the building are located in the dispatch office for security reasons. The dispatch office is staffed 24 hours a day 7 days a week by a police dispatcher. This building has the proper address markings on it.

### **Deficiencies/Deficiency**

**Item #1 Exit light in workout room (rear exit) is not illuminated.**

NFPA 1 14.14.5.2.1 Every sign required to be illuminated by 14.14.6.3 and 14.14.6.4 shall be continuously illuminated as required under the provisions of Section 7.8 of NFPA 101 unless otherwise provided in 14.14.5.2.2. [101:7.10.5.2.1]

**Item #2 Workout room and town offices on the annex side of the building lacks fire alarm detection equipment (smoke detectors).**

NFP 72 5.5.2.1 Total (Complete) Coverage. If required and unless otherwise modified by 5.5.2.1.1 through 5.5.2.1.6, total coverage shall include all rooms, halls, storage areas, basements, attics, lofts, spaces above suspended ceilings, and other subdivisions

and accessible spaces as well as the inside of all closets, elevator shafts, enclosed stairways, dumbwaiter shafts, and chute

**Item #3 Prisoner holding areas (cell block) in basement are not covered under the Existing Business Occupancy chapter of the fire code and are therefore non-compliant. Attached is a copy of operating procedures for Detention and Correctional Occupancies.**

**NFPA 101 39.2.1.1 All means of egress shall be in accordance with Chapter 7 and this chapter.**

**NFPA 101 7.1.10.1\* Means of egress shall be continuously maintained free of all obstructions or impediments to full instant use in the case of fire or other emergency.**

**Item #4 Portable fire extinguishers lack up to date testing certificates**

**NFPA 1 13.6.6.8.1.2\* Maintenance, servicing, and recharging shall be performed by trained persons having available the appropriate servicing manual(s), the proper types of tools, recharge materials, lubricants, and manufacturer's recommended replacement parts or parts specifically listed for use in the fire extinguisher. [10:6.1.4]**

**NFPA 1 13.6.6.8.3.1 Frequency. Fire extinguishers shall be subjected to maintenance at intervals of not more than 1 year, at the time of hydrostatic test, or when specifically indicated by an inspection or electronic notification. [10:6.3.1]**

**\* If you fail to comply with this notice, or file for an appeal with the Fire Safety Code Board of Appeal and Review within the 30 day time frame, you may be liable for the penalties provided for by law for such violations. Keep copy of Inspection Report on file at structure that was inspected to reference on follow up inspection.**

  
\_\_\_\_\_  
Brian Gartland  
Assistant Deputy State Fire Marshal

This report was received by: Paulette D. Hamilton  
Signature

Paulette D. Hamilton  
Print Name

Town Administrator  
Title

Date: July 29, 2010

Assistant Deputy State Fire Marshal's Initials: PL

- (1) They shall limit the occupant load to not more than 200 residents in any smoke compartment.
- (2)\*They shall limit the travel distance to a door in a smoke barrier, unless otherwise permitted by 23.3.7.4, as follows:
  - (a) The distance from any room door required as exit access shall not exceed 100 ft (30 m).
  - (b) The distance from any point in a room shall not exceed 150 ft (46 m).

**23.3.7.4** The maximum travel distance to a door in a smoke barrier shall be permitted to be increased by 50 ft (15 m) in smoke compartments protected throughout by an approved automatic sprinkler system in accordance with 23.3.5.3 or an automatic smoke control system.

**23.3.7.5\*** Any required smoke barrier shall be constructed in accordance with Section 8.5, shall be of substantial construction, and shall have a structural fire resistance.

**23.3.7.6** Openings in smoke barriers shall be protected in accordance with Section 8.5, unless otherwise permitted by the following:

- (1)\*The total number of vision panels in any barrier shall not be restricted.
- (2) Sliding doors in smoke barriers that are designed to normally be kept closed and are remotely operated from a continuously attended location shall not be required to be self-closing.

**23.3.7.7** Not less than 6 net ft<sup>2</sup> (0.55 net m<sup>2</sup>) per occupant shall be provided on each side of the smoke barrier for the total number of occupants in adjoining compartments, and this space shall be readily available wherever occupants are moved across the smoke barrier in a fire emergency.

**23.3.7.8** Doors shall provide resistance to the passage of smoke. Swinging doors shall be self-latching, or the opening resistance of the door shall be not less than 5 lbf (22 N). Such doors shall not be required to swing in the direction of egress travel.

**23.3.7.9** Doors in smoke barriers shall conform with the requirements for doors in means of egress as specified in Section 23.2 and shall have locking and release arrangements according to the applicable use condition. The provisions of 23.2.11.8.2 shall not be used for smoke barrier doors serving a smoke compartment containing more than 20 persons.

**23.3.7.10** Vision panels shall be provided in smoke barriers at points where the barrier crosses an exit access corridor.

**23.3.7.11** Smoke dampers shall be provided in accordance with 8.5.5, unless otherwise permitted by 23.3.7.12.

**23.3.7.12** Arrangements and positioning of smoke detectors required by 23.3.7.11 shall be permitted to prevent damage or tampering, or for other purposes, provided that the following criteria are met:

- (1) Such arrangements shall be capable of detecting any fire.
- (2) The placement of detectors shall be such that the speed of detection is equivalent to that provided by the spacing and arrangement required by *NFPA 72, National Fire Alarm Code*, as referenced in 8.5.5.7.1.

**23.3.8\* Special Protection Features— Subdivision of Resident Housing Spaces.** Subdivision of facility spaces shall comply with Table 23.3.8.

## 23.4 Special Provisions.

### 23.4.1 Limited Access Structures.

**23.4.1.1** Limited access structures used as detention and correctional occupancies shall comply with 23.4.1.2, unless otherwise permitted by the following:

- (1) The provisions of Section 11.7 for limited access structures shall not apply.
- (2) The requirement of 23.4.1.1 shall not apply to buildings protected throughout by an approved automatic sprinkler system in accordance with 23.3.5.3.

**23.4.1.2** Any one of the following means shall be provided to evacuate smoke from the smoke compartment of fire origin:

- (1) Operable windows on not less than two sides of the building, spaced not more than 30 ft (9.1 m) apart, that provide openings with dimensions of not less than 22 in. (560 mm) in width and 24 in. (610 mm) in height
- (2)\*Manual or automatic smoke vents
- (3) Engineered smoke control system
- (4) Mechanical exhaust system providing not less than six air changes per hour
- (5) Other method acceptable to the authority having jurisdiction

**23.4.2 Underground Buildings.** See Section 11.7 for requirements for underground buildings.

**23.4.3 High-Rise Buildings.** Existing high-rise buildings shall be protected throughout by an approved, supervised automatic sprinkler system in accordance with 23.3.5.3. A sprinkler control valve and a waterflow device shall be provided for each floor.

### 23.4.4 Reserved.

### 23.4.5 Lockups.

#### 23.4.5.1 General.

**23.4.5.1.1** Lockups in occupancies, other than detention and correctional occupancies and health care occupancies, where the holding area has capacity for more than 50 detainees shall be classified as detention and correctional occupancies and shall comply with the requirements of Chapter 23.

**23.4.5.1.2** Lockups in occupancies, other than detention and correctional occupancies and health care occupancies, where any individual is detained for 24 or more hours shall be classified as detention and correctional occupancies and shall comply with the requirements of Chapter 23.

**23.4.5.1.3** Lockups in occupancies, other than detention and correctional occupancies and health care occupancies, where the holding area has capacity for not more than 50 detainees, and where no individual is detained for 24 hours or more, shall comply with 23.4.5.1.4 or 23.4.5.1.5.

**23.4.5.1.4** The lockup shall be permitted to comply with the requirements for the predominant occupancy in which the lockup is placed, provided that all of the following criteria are met:

- (1) Doors and other physical restraints to free egress by detainees can be readily released by staff within 2 minutes of the onset of a fire or similar emergency.
- (2) Staff is in sufficient proximity to the lockup so as to be able to effect the 2-minute release required by 23.4.5.1.4(1) whenever detainees occupy the lockup.

OPTION  
1

101-230

LIFE SAFETY CODE

Table 23.3.8 Subdivision of Resident Housing Spaces

Feature	Use Condition									
	II		III				IV		V	
	NS	AS	NS		AS		NS	AS	NS	AS
Room to room separation	NR	NR	NR		NR		SR	NR	SR	SR <sup>a</sup>
Room face to corridor separation	NR	NR	SR <sup>b</sup>		NR		SR <sup>b</sup>	NR	FR <sup>b</sup>	SR <sup>a</sup>
Room face to common space separation	NR	NR	NR ≤50 ft (≤15 m) <sup>c</sup>	SR <sup>b</sup> >50 ft (>15 m) <sup>c</sup>	NR ≤50 ft (≤15 m) <sup>c</sup>	SR <sup>b</sup> >50 ft (>15 m) <sup>c</sup>	SR <sup>b</sup>	NR ≤50 ft (≤15 m) <sup>c</sup>	SR <sup>a</sup> >50 ft (>15 m) <sup>c</sup>	SR <sup>b</sup> SR <sup>a</sup>
Common space to corridor separation	SR	NR	SR		NR		SR	NR	FR	SR <sup>a</sup>
Total openings in solid room face where room face is required to be smoke resistant or fire rated <sup>d</sup>	0.85 ft <sup>2</sup> (0.08 m <sup>2</sup> )		0.85 ft <sup>2</sup> (0.08 m <sup>2</sup> )				0.85 ft <sup>2</sup> (0.08 m <sup>2</sup> )		0.85 ft <sup>2</sup> (0.08 m <sup>2</sup> ) where meeting one of the following: (1) Kept in closed position, except when in use by staff (2) Closable from the inside (3) Provided with smoke control	

NS: Not protected by automatic sprinklers. AS: Protected by automatic sprinklers. NR: No requirement.  
SR: Smoke resistant. FR: Minimum 1-hour fire resistance rating.

## Notes:

(1) Doors in openings in partitions required to be fire rated (FR) in accordance with Table 23.3.8, in other than required enclosures of exits or hazardous areas, are required to be substantial doors of construction that resists fire for a minimum of 20 minutes. Vision panels with wired glass or glass with not less than 45-minute fire-rated glazing are permitted. Latches and door closers are not required on cell doors.

(2) Doors in openings in partitions required to be smoke resistant (SR) in accordance with Table 23.3.8 are required to be substantial doors of construction that resists the passage of smoke. Latches and door closers are not required on cell doors.

(3) Under Use Condition II, Use Condition III, or Use Condition IV, a space subdivided by open construction (any combination of grating doors and grating walls or solid walls) is permitted to be considered one room if housing not more than 16 persons. The perimeter walls of such space are required to be of smoke-resistant construction. Smoke detection is required to be provided in such space. Under Use Condition IV, common walls between sleeping areas within the space are required to be smoke resistant, and grating doors and fronts are permitted to be used. Under Use Condition II and Use Condition III, open dormitories are permitted to house more than 16 persons, as permitted by other sections of this chapter.

(4) Where barriers are required to be smoke resistant (SR), the provisions of Sections 8.4 and 8.5 do not apply.

<sup>a</sup>Might be no requirement (NR) where one of the following is provided:

- (1) Approved automatic smoke detection system installed in all corridors and common spaces
- (2) Multitiered cell blocks meeting the requirements of 23.3.1.3

<sup>b</sup>Might be no requirement (NR) in multitiered, open cell blocks meeting the requirements of 23.3.1.3.

<sup>c</sup>Travel distance through the common space to the exit access corridor.

<sup>d</sup>"Total openings in solid room face" include all openings (for example, undercuts, food passes, grilles), the total of which are not to exceed 0.85 ft<sup>2</sup> (0.08 m<sup>2</sup>). All openings are required to be 36 in. (915 mm) or less above the floor.

(3) Staff is authorized to effect the release required by 23.4.5.1.4(1).

(4) Staff is trained and practiced in effecting the release required by 23.4.5.1.4(1).

(5) Where the release required by 23.4.5.1.4(1) is effected by means of remote release, detainees are not to be restrained from evacuating without the assistance of others.

23.4.5.1.5 Where the lockup does not comply with all the criteria of 23.4.5.1.4, the requirements of 23.4.5.2 shall be met.

## 23.4.5.2 Alternate Provisions.

23.4.5.2.1 The requirements applicable to the predominant occupancy in which the lockup is placed shall be met.

23.4.5.2.2 Where security operations necessitate the locking of required means of egress, the following shall apply:

- (1) Detention-grade hardware meeting the requirements of ASTM F 1577, *Standard Test Methods for Detention Locks for Swinging Doors*, shall be provided on swinging doors within the required means of egress.

OPTION 2

OPTION 3 "ADDRESS THIS SITUATION WITH THE NORTH SMITHFIELD FIRE MARSHALS OFFICE."

## EXISTING DETENTION AND CORRECTIONAL OCCUPANCIES

- (2) Sliding doors within the required means of egress shall be designed and engineered for detention and correctional use, and lock cylinders shall meet the cylinder test requirements of ASTM F 1577.

**23.4.5.2.3** The lockup shall be provided with a complete smoke detection system in accordance with 9.6.2.9.

**23.4.5.2.4** Where the requirements applicable to the predominant occupancy do not require a fire alarm system, the lockup shall be provided with a fire alarm system meeting the following criteria:

- (1) The alarm system shall be in accordance with Section 9.6. ~~ance with 9.6.2.9~~ system shall be accomplished by all

### 23.5 Building Services.

#### 23.5.1 Utilities.

**23.5.1.1** Utilities shall comply with the provisions of Section 9.1.

**23.5.1.2** Alarms, emergency communications systems, and the illumination of generator set installations shall be provided with emergency power in accordance with *NFPA 70, National Electrical Code*, unless otherwise permitted by 23.5.1.3.

**23.5.1.3** Systems complying with earlier editions of *NFPA 70, National Electrical Code*, and not presenting a life safety hazard shall be permitted to continue to be used.

#### 23.5.2 Heating, Ventilating, and Air-Conditioning.

**23.5.2.1** Heating, ventilating, and air-conditioning equipment shall comply with the provisions of Section 9.2 and shall be installed in accordance with the manufacturer's specifications, unless otherwise permitted by the following:

- (1) The requirement of 23.5.2.1 shall not apply where otherwise modified by 23.5.2.2.  
 (2) Systems complying with earlier editions of the applicable codes and not presenting a life safety hazard shall be permitted to continue to be used.

**23.5.2.2** Portable space-heating devices shall be prohibited, unless otherwise permitted by 23.5.2.4.

**23.5.2.3** Any heating device, other than a central heating plant, shall be designed and installed so that combustible material cannot be ignited by the device or its appurtenances, and the following requirements also shall apply:

- (1) If fuel-fired, such heating devices shall comply with the following:
- They shall be chimney connected or vent connected.
  - They shall take air for combustion directly from outside.
  - They shall be designed and installed to provide for complete separation of the combustion system from the atmosphere of the occupied area.
- (2) The heating system shall have safety devices to immediately stop the flow of fuel and shut down the equipment in case of either excessive temperatures or ignition failure.

**23.5.2.4** Approved, suspended unit heaters shall be permitted in locations other than means of egress and sleeping areas, provided that both of the following criteria are met:

- Such heaters are located high enough to be out of the reach of persons using the area.
- Such heaters are vent connected and equipped with the safety devices required by 23.5.2.3(2).

**23.5.2.5** Combustion and ventilation air for boiler, incinerator, or heater rooms shall be taken directly from, and discharged directly to, the outside.

**23.5.3 Elevators, Escalators, and Conveyors.** Elevators, escalators, and conveyors shall comply with the provisions of

**23.5.4.3** ~~11.8.1.1~~ room used for no other purpose and protected in accordance with Section 8.7.

**23.5.4.4** Incinerators shall not be directly fuel-fed, and floor chutes shall not directly connect with the combustion chamber.

### 23.6 Reserved.

### 23.7 Operating Features.

#### ~~23.7.1~~ Attendants, Evacuation Plan, and Fire Drills.

**23.7.1.1** Detention and correctional facilities, or those portions of facilities having such occupancy, shall be provided with 24-hour staffing, and the following requirements also shall apply:

- Staff shall be within three floors or a 300 ft (91 m) horizontal distance of the access door of each resident housing area.
- For Use Condition III, Use Condition IV, and Use Condition V, the arrangement shall be such that the staff involved starts the release of locks necessary for emergency evacuation or rescue and initiates other necessary emergency actions within 2 minutes of alarm.
- The following shall apply to areas in which all locks are unlocked remotely in compliance with 23.2.11.8:
  - Staff shall not be required to be within three floors or 300 ft (91 m) of the access door.
  - The 10-lock, manual key exemption of 23.2.11.8.2 shall not be permitted to be used in conjunction with the alternative requirement of 23.7.1.1(3)(a).

**23.7.1.2\*** Provisions shall be made so that residents in Use Condition III, Use Condition IV, and Use Condition V shall be able to notify staff of an emergency.

**23.7.1.3\*** The administration of every detention or correctional facility shall have, in effect and available to all supervisory personnel, written copies of a plan for the protection of all persons in the event of fire, for their evacuation to areas of refuge, and for evacuation from the building when necessary.

**23.7.1.3.1** All employees shall be instructed and drilled with respect to their duties under the plan.