

01/19/2024

Every winter, Kansas is subject to cold weather that causes issues with sprinkler systems. Subsequently, our office receives questions regarding this topic. One question we frequently get is, can we empty our sprinkler system to keep it from freezing and use fire watch as a replacement?

Answer: The Office of the State Fire Marshal does not approve any pre-empted disabling of a fire sprinkler system during freezing temperatures as it is inconsistent with the Kansas Fire Prevention Code.

NFPA 101 Section 4.6.12.1 As building owners and operators are responsible for maintaining the building in compliance with the Kansas Fire Prevention Code since the building has a fire sprinkler system installed and has physical appearance of life safety and/or fire protection this shall be always maintained in operable conditions.

NFPA 25 2012 4.1.1.1 states that an area with sprinklers is to be protected with temperature that shall be maintained at a temperature of 40 degrees to prevent freezing.

IFC 2012 chapter 9 states it is unlawful for any person to remove, tamper with or otherwise disturb any fire hydrant, fire detection system, fire alarm or fire suppression system other than for the sole purpose of repairs. This could be and punishable by code.

In addition, it has been asked if space heaters can be used to keep the sprinkler system warm. In response to this question, CMS has advised:

NFPA 13 requires facilities to provide a minimum temperature of 40°F for sprinkler systems. E015 requires safe and comfortable temperatures that shall be provided by a central heating plant. Facilities that cannot maintain temperatures are required to evacuate.

Facilities must establish policies and procedures that determine how required heating and cooling of their facility will be maintained during an emergency situation, as necessary, if there were a loss of the primary power source. Facilities are not required to heat and cool the entire building evenly but must ensure safe temperatures are maintained in those areas deemed necessary to protect patients, other people who are in the facility, and for provisions stored in the facility during the course of an emergency, as determined by the facility risk assessment. If unable to meet the temperature needs, a facility should have a relocation/evacuation plan (that may include internal relocation, relocation to other buildings on the campus or full evacuation). The relocation/evacuation should take place in a timely manner so as not to expose patients and residents to unsafe temperatures.

**NOTE:** For LTC facilities under 483.10(i)(6), there are additional requirements for facilities who were initially certified after October 1, 1990 who must maintain a temperature range of 71°F (min) to 81 °F (max). Facilities should include their Medicare (and Medicaid, as applicable) certification date(s) in the front of their plan.

With this being an annual issue, it is necessary for facilities to come up with permanent solutions to deal with the cold temperatures during the winter months.

Sincerely,

Office of the State Fire Marshal