



February 22, 2015

Evo Inc.
20560 SW 115th Ave.
Tualatin, OR 97062

Attention: Mr. Scott Heim

Reference: Location of Pull Stations on EVent™ 35E, 48E and 48E PLUS Cooking Stations

Dear Scott:

Please accept this letter in respect to Buckeye Fire Equipment's approval for the location of the manual pull stations located as a part of the "UL approved" fire suppression system found on the aforementioned Evo, Inc. cooking equipment. I offer the following information to support this approval.

- 1) The appliances referenced above completed intense scrutiny from the performance testing requirements of UL 710B. As such, the current pull station location was observed, tested and approved.
 - a) Section 37.10; page 80. "Cord-connected integral re-circulating systems and permanently connected integral re-circulating systems with casters, shall be provided with means of manual actuation of the extinguishing system. The actuation means **shall be located in an area where it is accessible in the event of a fire on the cooking surface of the appliance**. Such means shall be mechanical and shall not rely on electrical power for actuation. See 82.5"
 - b) Section 63.2.1; page 116. "When an extinguishing system employs a mechanical means for manual activation it **shall be actuated to demonstrate proper installation**. The extinguishing system shall actuate when the manual pull is actuated. With concurrence with all parties involved, this test is not prohibited from being combined with the Delayed actuation fire test, 61.4."
 - c) Section 37.11; page 80. "The actuation means required by 37.10 for a **floor supported** appliance shall be located between 42 and 60 inches (1066.8 mm to 1544 mm) above the floor. *This section applies to permanently mounted appliances and is not applicable for portable or semi-portable devices.*
 - d) Section 37.12; page 80. "When a **permanently installed appliance** is connected to an integral manual actuation means for a fire suppression system, the actuation means shall comply with sections 37.10 and 37.11. *This is the requirement that calls for the manual pull station to be located 42 to 60 inches (1066.8 mm to 1544 mm) from floor. Since this appliance and its associated approvals are for a semi-portable / portable appliance, this section of the standard does not apply. Therefore, the appliance with the location of the manual pull station location as installed and tested is the "approved location"*.





- 2) NFPA 96, Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations 2014 Edition.
 - a) Section 10.2.6; page 96-21. “Fire-Extinguishing Systems shall be installed in accordance with their **listing, the manufacturer’s instructions**, and the following standards where applicable:
 - (1) NFPA 12
 - (2) NFPA 13
 - (3) NFPA 17
 - (4) NFPA 17A
 - (5) NFPA 750
 - b) *It must be noted that where there may be a conflict between a standard requirement and that of the equipment manufacturer’s approvals, the compliance to the appliance approval is considered the most appropriate course of due process particularly if the approval postdates that of the standard’s acceptance or cycle.*
 - c) *There are several proposals to the existing NFPA 96 standard addressing the min / max distance requirement for location of manual pull stations. These proposals are a direct result due to recent approved changes made to NFPA 17A and the need for reciprocity among these standards. The proposals include elimination from the NFPA 96 standard in its entirety the manual pull station location reference as this is considered part of the scope of 17A and the call to allow alternative locations “acceptable to the authority having jurisdiction” to allow for local review and approvals. The changes made to NFPA 17A were a result of the standard not addressing portable, semi-portable appliances as well as small room exceptions where the minimum 10’ maximum 20’ requirement cannot be met, as well as cases where meeting the standard causes unnecessary burden to the user based on building design and layout. Due to the NFPA Standards Council requirement of reciprocity among the standards, and a requirement to stay within the scope of the particular standard, it is felt that at minimum the language currently in the latest edition of NFPA 17A will most likely be accepted during this revision cycle and is supported by Buckeye Fire Equipment.*
- 3) NFPA 17A, Standard for the Design, Installation, and Maintenance of Wet Chemical Fire Extinguishing Systems.
 - a) Section 5.2.1.11; page 17A-7. “At least one manual activation device shall be installed in accordance with NFPA 96, *Standard for Ventilation Control and Fire Protection of Commercial Cooking Operations*, or as **directed by the authority having jurisdiction, within the limitations of the manufacturer’s design, installation, and maintenance manual.**





- 4) Additional Considerations Taken Into Account for This Determination:
- a) The pull station location on the EVent 35E and 45E are UL approved locations based on the performance testing witnessed by Underwriter Laboratories personnel
 - b) NFPA 17A allows for the exception of pull station location as “acceptable to the Authority Having Jurisdiction” by reference to NFPA 96 to include locations for portable or semi-portable appliances that have undergone UL performance testing and approvals and where these locations are in accordance with the manufacturer design, installation, and maintenance requirements.
 - c) In the case of inclusive safety design and approvals, Underwriter Laboratories and Buckeye Fire Equipment can be considered the “authority having jurisdiction” for the fire protection and safety features of the EVent cooking appliances notwithstanding local approvals and compliance.
 - d) In situations where an appliance is approved to the UL 710B standard, deviation from design will be a deviation to the UL approval.
 - e) Pull station locations outside of the appliance / cooking area will cause confusion in the event of a catastrophic event as to which pull station actuation will result in fire suppression system activation for a given cooking appliance where multiple appliances are located in a single area or restaurant.
 - f) Pull station locations in direct proximity of the effected cooking appliance will allow for immediate response by the cooking personnel for the given appliance and will eliminate confusion to others as to the correct pull station to activate
 - g) Occupants should immediately evacuate the space to a safe and secure area during a catastrophic event while attempting notification of the fire alarm, building alarm systems only during the evacuation process.
 - h) Restaurant personnel shall be trained in the event of a catastrophic event to insure proper and cordial evacuation of the premises and activation of the installed safety systems.
 - i) Pull stations located directly on the appliance are considered “along the path of egress” for restaurant personnel
 - j) System design requires interlocks of the ventilation system where as the ventilation system must be on during cooking operations and remain on during fire suppression system activation. This requirement provides for “early detection” of any fire situation.
 - k) System activation from an automatic response will be well inside the UL “delayed system actuation” (pre-burn) requirement of 30 seconds following auto ignition due to the ventilation system operation pulling any elevated heat source directly down and into the ventilation system and in direct contact with the fusible link assembly designed to activate the fire suppression system. *Note: Auto ignition occurs at approximately 685-700 F. Temperature requirements of the fusible link assembly are a fixed temperature 280F sensing device.*
 - l) Installation of an additional “fixed” pull station remote from the cooking appliance will render this appliance no longer a semi-portable or portable device (a significant deviation to the appliance approvals) and will no longer allow this appliance to be moved in any manner without activation of the fire suppression system or fire alarm system if so equipped





- m) Installation of a “fixed” remote pull station will prevent the owner / operator from appropriately performing proper house-keeping in, around, or under the appliance creating a concern for fuel loading and grease build-up. Such grease build-up outside of the protected zone is not calculated into the design of the fire suppression system and may result in catastrophic failure to suppress fire, injury, or death.

In Summary:

1. The pull station location positioned on the EEvent 35E, 48E and 48E PLUS cooking appliances are in accordance with their UL Approval and the parameters as set forth by the fire protection system manufacturer.
2. Buckeye Fire Equipment and Underwriter Laboratories are the “authority having jurisdiction” for integrated design of the cooking appliance, ventilation system, safety features and fire suppression system for these appliances.
3. Local authorities may also require additional approvals such as acceptance testing, permitting, and drawings as a part of the local approvals process.

Should you require further information or wish to discuss this further, my contact information is provided below.

Sincerely,

A handwritten signature in black ink that reads "James M. Shea".

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