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Exercising the Life Safety and Critical Branch ATS

Recently a question was raised about a mandatory annual exercise of each and all Life Safety and Critical Branch ATSs, to prove a minimum 10 second transfer time from a normal power failure until emergency power was available at the load side of each ATS

According to NFPA 99, this type of exercise is not required unless, during any monthly/annual test of any one LS or CB ATS, there is a greater than 10-second transfer.

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NFPA 99, Health Care Facilities Code, 2012 edition, 6.4.4.1.1.2: The 10second criterion shall not apply during the monthly testing of an essential electrical system. If the 10-second criterion is not met during the monthly test, a process shall be provided to annually confirm the capability of the life safety and critical branches to comply with 6.4.3.1.

Be aware that when using an ATS test switch, and while normal power is still available, there can be a delay if an in-phase monitor is active in the ATS you are using to start your monthly test. Personally, I would use another switch.

Lastly, there is software now available which will verify "start wire connections", passively.

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USA Today – August 26, 2019

Two years after <u>Hurricane Irma</u> slammed through South Florida, killing scores of people and knocking out power to three-quarters of the state, <u>four nursing home</u> workers are facing aggravated manslaughter and other charges in the <u>deaths of 12 residents felled</u> by the <u>searing heat</u> the storm left behind. Operators of the center failed to evacuate for three days despite a <u>lack of air conditioning</u> that caused temperatures in the building to soar.

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In the words of an attorney who has spent many years representing personal injury plaintiffs:

"I would ask for their protocols and then I would depose everyone I could find looking for examples where the protocols were not followed. Then I'd hire an expert to pick apart their protocols for any deficiencies. I only need one point of failure if I'm the plaintiff's attorney; either bad protocols or failure to follow those protocols are enough.

Keep in mind that the equipment manufacturer can also be sued, so inevitably there will be cross-claims between the hospital and the equipment manufacturer. If the hospital's protocols result in a use or maintenance schedule that goes against the manufacturer's recommendations, then that's another point of potential liability."

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12 People

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NFPA 99 and 110 Changes

- Microgrids Approved
- Fuel Cells Approved
- Record Keeping Increased
- Education Emphasized
- Fuel Polishing Reference
- Transfer Switch Inspections
- Al Capone Real Estate UL and TJC Leases Protection Rackets

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Location of EPOs

- CMS has decided EPOs do not belong on the outside of generator cabinets. No reference stated, "CMS's long-standing interpretation is that a manual stop needs to be "remote" from the generator as prescribed by 2010 NFPA 110, 5.6.5.6. As such, to be "remote," a manual stop could not be located on the generator housing."
- NFPA 110, 5.6.5.6 All installations shall have a remote manual stop station of a type to prevent inadvertent or unintentional operation located outside the room housing the prime mover, where so installed, or elsewhere on the premises where the prime mover is located outside the building.

Location of EPOs – NFPA 110, 2019 edition

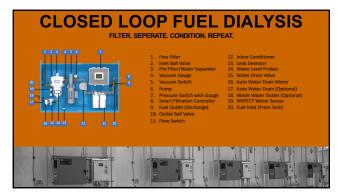
- NFPA 110, 5.6.5.6 All installations shall be provided with at least one remote emergency stop switch for each prime mover.
- NFPA 110, 5.6.5.6.1 The remote emergency stop switch shall be located outside the room housing the prime mover or exterior enclosure and shall be permitted to be mounted on the exterior of the enclosure.

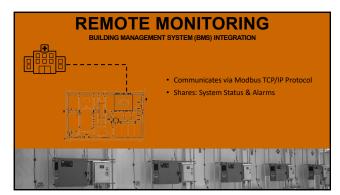
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Fuel Tests and Polishing

- Fuel polishing is required to maintain clean diesel fuel.
- The CMS requires proof of fuel maintenance plans in order to comply with 42 CFR 482(e)(3) as part of their SOC.
- It is not mandatory that a facility own their own fue polishing equipment.

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Inspection of Automatic Transfer Switches

- Lights and Switch Position only.
- Doors should not be opened unless PPE used Nothing good can happen by opening an ATS door unprotected.
- Keep Additional Inspection Records AHJs are asking for them.

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Test Reports

- They <u>do not</u> have to be manually recorded.
- Recording equipment does not have to be hard wired. (Only remote annunciation according to NFPA 110, 5.6.5.2 must be hard wired, and that requirement will soon be removed from standards.)
 The report need only record specific data according to manufacturer's manuals, or the optional template at NFPA 110, Figure A.8.4.1 (a).
- Wireless recording <u>is</u> allowed, takes less staff time, always accurate, and when automated...is an invaluable tool for round-the-clock monitoring.

Test Reports

BMS not allowed. NFPA 99, 6.4.1.1.18.7 A centralized computer system (e.g., building automation system) shall not be permitted to be substituted for the alarm annunciator in 6.4.1.1.18 but shall be permitted to be used to supplement the alarm annunciator.

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Wireless Benefits

- Alerts staff anytime generator has been asked to start, including no-load tests and power outages.
- Alerts the proper staff personnel, and the EPSS contractor, and not just with an audible and visual signal. (I can start, and monitor, over 1200 from phone.)
- Records and archives all generator run events, not just compliance testing.(*)
- (*) automatic data collection during power outages may substitute for compliance testing if duration and load percentages meet the minimum standards. (NFPA 110, 8.4.1.1)

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NYC and NY State Emissions Issues

AO8429 (State) - On July 18, Gov. Andrew Cuomo signed the Climate Leadership and Community Protection Act, which calls for the state to derive 100% of electric power from renewable sources by 2040 and to eliminate or offset all greenhouse gas emissions by 2050.

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NYC and NY State Emissions Issues

LL 97 (NYC Only) - Impacts over 57,000 buildings across the city with the goal of reducing building-based emissions 40% by 2030 from a 2005 baseline. To comply, building owners must submit an emissions intensity report stamped by a registered design professional every year starting in 2025 or pay substantial fines.

Owners of nonprofit hospitals and healthcare facilities have the option to apply for a percent reduction requirement rather than a cap. If they apply by July 2021, they are required to reduce carbon emissions 15 percent below 2018 levels for 2024-2029, and 30 percent below 2018 levels for 2030-2034.

Microgrids - Latitude in Design and Retrofitting

- Formula determining if you are a prospect
- Who to select MEP firm

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Fuel Cells

Are allowed to be a part of the EPSS...if, paralleled with another acceptable source of power that can be on-line from a black start in 10 seconds.

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Life Safety and Critical Branch Electrical Panels- Mixed Circuits?

- Life Safety Branch Panels- do you have circuits feeding equipment not allowed to be on the Life Safety Branch or Critical as described in NFPA 99 (2012) Chapter 6 Electrical Systems?

 Does the main Fire Alarm circuit (identified in RED per EC.02.05.01 EP 9 Note # 2) share the same circuit with other equipment?
- Are the Life Safety and Critical Branch electrical panel legends up to date?
- Any installed breaker in a electrical panel must identify what the circuit serves or be labeled as a "spare".

Life Safety Branch Allowed Circuits Per NFPA 99 (2012) Chapter 6 Electrical Systems

6.4.2.2.3.2 The life safety branch shall supply power for lighting, receptacles, and equipment as follows:

(1) Illumination of means of egress in accordance with NFPA IDI, Life Safety Code

(2) East signs and exit directional signs in accordance with NFPA IDI, Life Safety Code

(3) "Hospital communications systems, where used for issuing instruction during emergency conditions

(4) Generator set location as follows:

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Critical Branch Allowed Circuits Per NFPA 99 (2012) Chapter 6 Electrical Systems

6.4.2.2.42 The critical branch shall supply power for task illumination, fixed equipment, select receptacles, and select power circuits serving the following areas and functions related to patient care:

(1) Critical care areas that utilize meanthetizing gases, task illumination, select receptacles, and fixed equipment

(2) Isolated power systems in special environments

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Critical Branch Allowed Circuits Per NFPA 99 (2012) Chapter 6 Electrical Systems Cont'd

