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**From:** Eddie Hall Intertek  
**Sent:** Thursday, September 24, 2015 9:50 AM  
**To:** Nunnemacher, Jacob (DFS); Fredette, Richard (DFS)  
**Subject:** FW: NFPA 110 8.3.8 Fuel quality tests

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Richard/Jacob,

NFPA has issued the following response. I wanted to share this with you.

Unfortunately this is confusing to the hospitals, as they do not know what they should be testing for. Anything we can do to help them define the requirements would be very helpful. For example, I have had some hospitals come to me requesting the full ASTM D975 slate (Diesel testing), which is great for commerce, but does not take into consideration long term storage issues. It includes a number of tests that hospitals simply do not lead, would not assure them of operable fuel, and is an unnecessary cost. It does not take into consideration bacteria, or particles that would clog filters or injectors over time. Just some of our concerns and efforts in trying to provide a valuable service to generator owners.

Thanks again for your input and assistance in trying to clear this up.

Sincerely,  
**Eddie Hall**

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**From:** Cloutier, Mark  
**Sent:** Thursday, September 24, 2015 8:49 AM  
**To:** Eddie Hall Intertek; richard.fredette@state.ma.us  
**Cc:** Duval, Bob; Henderson, Carol; David Stymiest; Bliss, Donald  
**Subject:** NFPA 110 8.3.8 Fuel quality tests

Date: 9/24/15

Good afternoon, my name is Edie Hall of Intertek USA. Intertek is a fuel testing company with a location in Chelsea, MA. We currently perform some testing for some Hospitals in the state and throughout the US. I have had some

discussions with Jacob Nunnemacher of the State of Massachusetts Fire Marshall's department concerning some questions that we had surrounding fuel testing in the state.

It is my understanding that according to state fire code 527 cmr 1.00: 11.7.5.2, refers to NFPA 110 for maintenance of standby generators. Currently NFPA 110 refers to ASTM testing standards for fuel monitoring. No specifics are given on exactly what ASTM tests should be performed in order to remain compliant.

To ensure that hospitals 1) remain compliant with the generator fuel testing per NFPA guidelines, and 2) stay up and running with quality fuel during a power outage, I would like to know if you could clarify Massachusetts' stance on testing requirements for generator fuel per NFPA 110. If there is currently no stance on this requirement, I would like to petition the board to please define what tests should be run according to NFPA 110 in order for hospitals to remain compliant and safe.

If you have any questions concerning ASTM testing standards, please feel free to contact me directly at (513) 288-3549. Our goal is to best serve the hospitals keeping them, their patients, and their facility safe.

This is in reply to your email concerning the NFPA 110. The NFPA electrical staff cannot approve a particular test standard, however, I can provide some general remarks.

NFPA 110 8.3.8 does not specify the ASTM standard due to the fact that there are many different types of fuel and methods of storage. The requisite jurisdiction has the function of determining the types of fuel used for such facilities and methods of storage. The requirement is to mandate that an approved test is performed based on an ASTM standard for that type of fuel.

<http://www.astm.org/Standards/petroleum-standards.html>

Mark Cloutier  
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