

Exchanging Fire Extinguishers for Maintenance and Hydrotesting.

- The practice of exchanging fire extinguisher for recharge, 6-year maintenance or Hydrotest.
 - When a fire extinguisher is damaged or requires recharge or hydrotest it may be advantageous to exchange that fire extinguisher for one that has already been repaired, recharged or hydrotested.
 - This practice saves the end user and fire technician time and money and should also provide the best environment for proper maintenance.
 - Saves time and money on return trips that will be affected by traffic and long distances.
 - Allows the fire extinguisher to be maintained in a controlled shop environment allowing for:
 - More leak check time
 - A weather free environment
 - Quality assurance checks
 - More immediate repair part availability – there are several hundred different models of approved fire extinguishers that all have different repair parts and chemicals.
 - Maintaining and repairing FE's from a vehicle defined in 557.19 is still very acceptable.
 - This practice also presents some specific concerns that must be addressed.
 - Potential Fraud
 - Exchanging new units with old
 - Exchanging FE's that are up to code with units that are not.
 - Exchanging FE's that fit the hazard with FE's that don't
 - Exchanging FE's with high performance characteristics with FE's with lesser performance
 - Not getting proper permission from owner or owner's representative before exchanging FE's.
 - Ensuring the FE is mounted on the Correct UL listed bracket
- Existing Title 19 Language prohibits this practice completely which adds significant unneeded costs to the maintenance of these FE's and is extremely difficult to enforce.
 - 591.5 Replacement Extinguishers.
 - Exchanges of portable fire extinguishers in lieu of completing the required maintenance or repair on the original unit are not allowed. Portable fire extinguishers shall not be removed from the premises for internal maintenance or repair without being temporarily replaced by a fire extinguisher suitable for the type of hazard being protected which shall be of at least equal rating and size. The replacement extinguisher shall be labeled as "LOANER" on the back of the Annual Maintenance tag. The owner's original unit shall be returned within 60 calendar days. Documentation must be left with the customer that contains the following:
 - (1) Specific Reason for Removal
 - (2) Date of Removal
 - (3) Manufacturer name and Serial number of extinguishers removed
 - (4) Date of Manufacture
 - (5) Signature by the owner or owner's representative
 - (6) Concern name
 - (7) License number
 - (8) Technicians name
 - (9) Certificate of registration number

- Therefore, we are proposing new language for Title 19 that allows for this practice but protects the end user from potential fraud.
 - Suggested Language for 560.5 - Portable Fire Extinguisher Exchanges -
 - Option 1 – JR’s suggestion - Fire extinguishers removed and replaced to address service requirements are only permitted with the prior knowledge and written permission of the owner or owner’s agent. Replacement fire extinguishers shall be of the same type and have equal performance characteristics necessary to satisfy applicable fire protection objectives.
 - Option 2 - Fire extinguishers removed from service and “exchanged” (see 557.5 Definitions) for maintenance requirements repair or hydrotest are only permitted with the prior knowledge and written permission of the RME or RMO as defined in 557.18. Exchange fire extinguishers shall be of the same operational characteristics, performance, and type necessary to meet or exceed applicable fire protection objectives and requirements.
 - This language would make Articles 6 & 7 unnecessary.