

VERMONT FIRE PREVENTION CODE

SECTION 1. TITLE

These regulations are adopted pursuant to Title 21 VSA, Section 252 & 262 and shall be known and cited as the Fire Prevention Code of the State of Vermont.

SECTION 2. INTENT OF CODE

It is the intent of this code to prescribe regulations consistent with nationally recognized good practice for the safeguarding of life from the hazards of fire and explosion arising from the storage, handling and use of hazardous substances, materials, and devices and from conditions hazardous to life or property in the use or occupancy of buildings or premises.

SECTION 3. SCOPE

- (a) This code shall apply to all public buildings and facilities and to all storage, handling, and use of hazardous substances, materials, and devices.
- (b) The provisions of this code shall apply equally to new and existing conditions except that existing conditions not in strict compliance with the terms of this code shall be permitted to continue where in the opinion of the Commissioner, the exceptions do not constitute a distinct hazard to life or property.
- (c) Nothing contained in this code shall be construed as applying to the transportation of any article or thing shipped under the jurisdiction of and in compliance with the regulations prescribed by the United States Department of Transportation, nor as applying to the military forces of the United States.
- (d) Nothing contained in this code shall be construed to prevent the enforcement of other laws which prescribe more restrictive limitations.

SECTION 4. DEFINITIONS

(a) As used in the Vermont Fire Prevention Code:

- (1) "Addition" means any extension or enlargement of a building.
- (2) "Alteration" means a change or rearrangement in the structural parts of a building, or a change in required window or exit facilities, or in the building service equipment regulated by this code.
- (3) "Approved" means approved by the Commissioner.
- (4) "Authority having jurisdiction" means the Commissioner.
- (5) "Building" means public building as defined under Chapter 25, Title 18, V.S.A. 1301.
- (6) "Building service equipment" is the mechanical, electrical, plumbing and elevator equipment, including piping, wiring, fixtures, and other accessories which constitute the sanitation, lighting, heating, ventilating, air-conditioning, fire extinguishing, and transportation facilities provided or required in a building.
- (7) "Commissioner" means the Commissioner of Labor & Industry or his authorized representative.
- (8) "Repair " means the renewal, replacement, or reinforcement of any existing part of a building, in keeping with its existing type of construction, arrangement of parts and occupancy, for maintenance purposes, including replacements and reinforcements because of fire damage and damage caused by the force of objects and the elements against a building.
- (9) "Repair, minor" is the renewal or replacement of any part of a building in keeping with the existing type of construction, arrangement of parts, and occupancy of the building, for maintenance purposes when the structural parts of the building are not affected.

- (b) When terms are not defined in this section and defined in the adopted National Safety Standards, they shall have the meaning ascribed to them in such standards.
- (c) Where terms are not defined under the provisions of this code or under the provisions of the adopted National Safety Standards, they shall have ascribed to them their ordinary accepted meanings or such as the context herein may imply.

SECTION 5. ADOPTION OF NATIONAL SAFETY STANDARDS

- (a) There is hereby adopted by the Commissioner for the purpose of prescribing regulations governing conditions hazardous to life and property from fire or explosion in public buildings and facilities, the following nationally recognized safety standards, being particularly the specified edition thereof except such portions as are hereinafter deleted, modified, or amended, of which standards one copy is on file in the Office of the Secretary of State and the same are hereby adopted and incorporated as fully as if set out at length herein.
- (1) Standard for Water Tanks for Private Fire Protection -
National Fire Protection Association Standard Number 22, Edition 1971.
 - (2) Flammable and Combustible Liquids Code -
National Fire Protection Association Standard Number 30, 1969 Edition.
 - (3) Standards for Spray Finishing Using Flammable and Combustible Materials -
National Fire Protection Association Standard Number 33, 1969 Edition.
 - (4) Standard for Dip Tanks Containing Flammable or Combustible Liquids -
National Fire Protection Association Standard Number 34, 1971 Edition.
 - (5) Standard for the Installation of Gas Appliances and Gas Piping -
National Fire Protection Association Standard Number 54, 1969 Edition.
 - (6) Standard for the Installation of Gas Piping and Gas Equipment on Industrial Premises and Certain Other Premises -
National Fire Protection Association Standard Number 54A, 1969 Edition.
 - (7) Standard for the Storage and Handling of Liquefied Petroleum Gases -
National Fire Protection Association Standard Number 58, 1969 Edition.
 - (8) Standard for the Storage and Handling of Liquefied Petroleum Gases at Utility Gas Plants -
National Fire Protection Association Standard Number 59, 1969 Edition.

- (9) Standard for the Production, Storage and Handling of Liquefied Natural Gas -
National Fire Protection Association Standard Number 59A, 1972 Edition.
 - (10) Lightning Protection Code -
National Fire Protection Association Standard Number 78, 1968 Edition.
 - (11) Standard for Prevention of Furnace Explosions in Natural Gas-fired Multiple Burner Boiler-Furnaces - National Fire Protection Association Standard Number 85B, 1971 Edition.
 - (12) Standard for Prevention of Furnace Explosions in Fuel Oil-fired Multiple Burner Boiler-Furnaces - National Fire Protection Association Standard Number 85D, 1972 Edition.
 - (13) Standard for Prevention of Furnace Explosions in Pulverized Coal-Fire Multiple Burner Boiler-Furnaces -
National Fire Protection Association Standard Number 85E, 1971 Edition.
 - (14) Standard for Tank Vehicles for Flammable and Combustible Liquids -
National Fire Protection Association Standard Number 385, 1971 Edition.
 - (15) Standard For Portable Shipping Tanks -
National Fire Protection Association Standard Number 386, 1970 Edition.
 - (16) Code for the Storage of Ammonium Nitrate -
National Fire Protection Association Standard Number 490, 1970 Edition.
 - (17) Separation Distances of Ammonium Nitrate and Blasting Agents from Explosives or Blasting Agents - National Fire Protection Association Standard Number 664, 1971 Edition.
 - (18) Standard for the prevention of Dust Explosions in Woodworking and Wood Flour Manufacturing Plants -
National Fire Protection Association Standard Number 664, 1971 Edition.
 - (19) Wherever practicable and pursuant to 18 V.S.A. 1305A, whenever federal, state, county and municipal funds are available Making Buildings and Facilities Accessible to and Usable by the Physically Handicapped -
American Standards Association Specification A117.1, dated 1961.
- (b) Code for Life Safety from Fire in Buildings and Structures -
National Fire Protection Association Standard Number 101, 1970 Edition.

NATIONAL FIRE PROTECTION ASSOCIATION STANDARDS NUMBERS

- 10 Installation of Portable Fire Extinguishers, 1972.
- 10A Maintenance and Use of Portable Fire Extinguishers, 1972.
- 11 Foam Extinguishing Systems, 1972.
- 11A High Expansion Foam Systems, 1970.
- 12 Carbon Dioxide Extinguishing Systems, 1972.
- 12A Halogenated Fire Extinguishing Agent Systems, 1972.
- 13 Installation of Sprinkler Systems, 1972.
- 13A Care and Maintenance of Sprinkler Systems, 1971
- 14 Installation of Standpipe and Hose Systems, 1971.
- 15 Water Spray Fixed Systems for Fire Protection, 1969.
- 17 Dry Chemical Extinguishing Systems, 1969.
- 20 Installation of Centrifugal Fire Pumps, 1972.
- 30 Flammable and Combustible Liquids Code, 1972.
- 31 Installation of Oil Burning Equipment, 1972.
- 32 Dry Cleaning Plants, 1970.
- 35 Manufacture of Organic Coatings, 1971.
- 36 Solvent Extraction Plants, 1972.
- 40 Storage and Handling of Cellulose Nitrate Motion Picture Film, 1967.
- 54 Installation of Gas Appliances and Gas Piping in Buildings, 1969.
- 56A Inhalation Anesthetic Code, 1972.
- 56C Hospital Laboratories, 1972.
- 56D Hyperbaric Facilities, 1970.
- 56F Non-flammable Medical Gas Systems, 1970.
- 58 Storage and Handling of Liquefied Petroleum Gases, 1972.
- 61A Prevention of Dust Explosions in Starch Factories, 1971.
- 61B Prevention of Dust Explosions in Grain Elevators and Bulk Handling Facilities, 1970.
- 61C Prevention of Dust Explosions in Flour and Feed Mills, Allied Grain Storage Elevators, 1971.
- 62 Dust Hazards of Pulverized Sugar and Cocoa, 1967.
- 651 Prevention of Dust Explosions in Aluminum Powder Manufacture, 1972.
- 652 Explosion and Fire Protection in Plants Handling Magnesium Powder or Dust, 1968.
- 654 Prevention of Dust Explosions in Woodworking and Wood Flour Manufacturing Plants, 1967.
- 656 Prevention of Dust Ignitions in Spice Grinding Plants, 1971.
- 657 Prevention of Dust Explosions in Confectionery Manufacturing Plants, 1967.
- 664 Prevention of Dust Explosions in Woodworking and Wood Flour Manufacturing Plants, 1967.

- 68 Explosion Venting Guide, 1954.
- 70 National Electrical Code, 1971.
- 71 Central Station Protective Signaling Systems, 1972.
- 72A Local Protective Signaling Systems, 1972.
- 72B Auxiliary Protective Signaling Systems, 1972.
- 72C Remote Station Protective Signaling Systems, 1972.
- 72D Proprietary Protective Signaling Systems, 1972.
- 76A Essential Electrical Systems for Hospitals, 1971.

(continued) National Fire Protection Association Standards Numbers

74	Household Fire Warning Equipment, 1972.
76A	Essential Electrical Systems for Hospitals, 1971.
80	Fire Doors and Windows, 1970.
82	Incinerators and Rubbish Handling, 1972.
85	Prevention of Furnace Explosions in Fuel Oil and Natural Gas-fired Watertube Boiler-Furnaces with One Burner, 1972.
87	Construction and Protection of Piers and Wharves, 1971.
88	Garages, 1968.
89M	Clearances for Heat Producing Appliances, 1971.
90A	Air Conditioning and Ventilating Systems, 1971.
90B	Installation of Residence Warm-Air Heating and Air Conditioning Systems, 1971.
91	Installation of Blower and Exhaust Systems for Dust Stock and Vapor Removal or Conveying, 1972.
96	Vapor Removal from Commercial Cooking Equipment, 1971.
102	Tents, Grandstands and Air-Supported Structures Used for Places of Assembly, 1972.
204	Smoke and Heat Venting Guide, 1968.
211	Chimneys, Fireplaces and Venting Systems, 1972.
220	Standard Types of Building Construction, 1961.
231	Indoor General Storage, 1972.
241	Standard for Safeguarding Building Construction Operations, 1968.
251	Methods of Fire Tests of Building Construction and Materials, 1972.
252	Methods of Fire Tests of Door Assemblies, 1972.
255	Tests of Surface Burning Characteristics of Building Materials, 1972.
409	Aircraft Hangars, 1972.
501A	Mobile Home Parks, 1972.
501B	Mobile Homes 1972.
701	Fire Tests for Flame Resistant Textiles and Films, 1969.
703	Fire Retardant Treatment for Building Materials, 1961.

(c) All existing Fire Prevention regulations are rescinded except this code shall include the following Vermont Fire Prevention regulations promulgated by the Commissioner of which regulations one copy is on file in the Office of the Secretary of State and the same are incorporated as fully as if set out at length herein.

- (1) Fireworks, 1953 Edition as amended.
- (2) Small Heating & Cooking Appliances, 1957 Edition.
- (3) Explosives, 1961 Edition.

SECTION 6. REFERENCE DOCUMENTS

(a) The specifications for the regulations set forth in Section 5 shall be found in the following reference documents:

- (1) Underwriters' Laboratories, Inc. -
Fire Protection Equipment List, 1971 Edition as amended.
- (2) Underwriters' Laboratories, Inc. -
Building Materials List, 1971, Edition as amended.
- (3) Underwriters Laboratories, Inc. -
Gas & Oil Equipment List, 1970, Edition.
- (4) American Insurance Association -
National Building Code, 1967, Edition.
- (5) Factory Mutual Engineering Corporation -
Factory Mutual Approval Guide, 1972, Edition.
- (6) Sheet Metal and Air Conditioning Contractors National Assoc. Inc.
Fire Damper Guide for Air Handling Systems, 1972 Edition.
- (7) National Electrical Code -
National Fire Protection Association Standard Number 70, 1971 Edition
- (8) Standard for the Installation and Use of Stationary Combustion
Engines and Gas Turbines -
National Fire Protection Association Standard Number 37, 1970 Edition.
- (9) Retail and Wholesale Lumber Storage Yards -
National Fire Protection Association Standard Number 47, 1961 Edition.
- (10) Standard for Gaseous Hydrogen Systems at Consumer Sites -
National Fire Protection Association Standard Number 50A, 1969 Edition
- (11) Standard for Liquefied Hydrogen Systems at Consumer Sites -
National Fire Protection Association Standard Number 50B, 1971 Edition.
- (12) Standard for the Installation and Operation of Oxygen-Fuel Gas
Systems for Welding and Cutting - National Fire Protection Assoc.
Standard Number 51, 1969 Edition.
- (13) Standard for Fumigation -
National Fire Protection Association Standard Number 57, 1968 Edition.

Reference Documents (continued)

- (14) Standard for the Installation, Maintenance and Use of Municipal Fire Alarm Systems -
National Fire Protection Association Standard Number 73, 1972 Edition.
- (15) Standard for the Protection of Electronic Computer/Data Processing Equipment - National Fire Protection Association Standard Number 75, 1972 Edition.
- (16) Standard for Ovens and Furnaces -
National Fire Protection Association Standard Number 86A, 1971 Edition.
- (17) Standard for Industrial Furnaces -
National Fire Protection Association Standard Number 86B, 1971 Edition.
- (18) Manual on Roof Coverings -
National Fire Protection Association Standard Number 203M, 1970 Edition.
- (19) Guide on Building Areas and Heights -
National Fire Protection Association Standard Number 206M, 1970 Edition.
- (20) Homes and Camps in Forest Areas -
National Fire Protection Association Standard Number 224, 1972 Edition.
- (21) Standard for Storage of Cellular Rubber and Plastic Materials -
National Fire Protection Association Standard Number 231B, 1968 Edition.
- (22) Standard for the Protection of Records-
National Fire Protection Association Standard Number 232, 1970 Edition.
- (23) Fire Protection Standard for Marinas and Boatyards -
National Fire Protection Association Standard Number 303, 1969 Edition.
- (24) Standard on Basic Classification of Flammable and Combustible Liquids-
National Fire Protection Association Standard Number 321, 1969 Edition.
- (25) Standard Procedures for Cleaning or Safeguarding Small Tanks and Containers - National Fire Protection Association Standard No. 327 Edition.
- (26) Standard for Aircraft Fuel Servicing -
National Fire Protection Association Standard Number 407, 1972 Edition.
- (27) Standard on Aircraft Ramp Fire Hazard Classifications and Precautions-
National Fire Protection Association Standard Number 411, 1970 Edition.
- (28) Fire Protection Practice for Facilities Handling Radioactive Materials-
National Fire Protection Association Standard Number 801, 1970 Edition.

(b) The Commissioner may:

- (1) Direct that tests of materials, devices, or structural assemblies be made, or sufficient evidence or proof be submitted, at the expense of the owner, where such evidence or proof is necessary to determine whether the material, device, or construction meets the requirements of this code.
- (2) Revoke or refuse to issue an approval where in the opinion of the Commissioner the results of tests referred to in subsection (1) are not satisfactory.

(c) In the case of any conflict between the provisions of this code and those of any reference document, the provisions of this code will always take precedence.

SECTION 7. INDEPENDENT SECTIONS: VALIDITY OR CONSTITUTIONALITY

Each section of this code and every part of each section is an independent section and the holding of any section or part thereof to be unconstitutional, void, or ineffective for any cause does not affect the validity or constitutionality of any other section or part thereof.

SECTION 8. ANNUAL HEARING

Annually on or before October 1, a hearing shall be conducted by the Commissioner pursuant to the Administrative Procedures Act for the purpose of amending, or adopting newly amended sections of the appropriate sections of the NEPA Code or such other sections of this code as the Commissioner deems appropriate.

SECTION 9. RESPONSIBILITY OF THE OWNER

Neither the granting of an approval of the drawings and specifications nor inspections made by the Commissioner shall in any way relieve the owner or lessee of such public building or premises from full responsibility for carrying out the work or having the work carried out in accordance with the requirements of this code.

SECTION 10. DUTIES OF THE OWNERS

Every owner or lessee of public property or premises shall:

- (a) Permit the Commissioner to enter any public building or premises at any reasonable time for the purpose of administering or enforcing this code.
- (b) Obtain approval of drawings and specifications from the Commissioner for all construction or major alteration of public buildings or premises prior to starting work on the building site.
- (c) Give written notice to the Commissioner thirty (30) days prior to desired occupancy or use of the building or premises described in

the plans and specifications approved by the Commissioner.

- (d) Obtain an occupancy approval from the Commissioner prior to any:
- (1) Occupancy of a building or part thereof after construction or alteration of that building or part, or
 - (2) Use of any plant or equipment on the premises, or
 - (3) Change in the class of occupancy of any building or part thereof.

SECTION 11. DRAWINGS AND SPECIFICATIONS, WHEN REQUIRED

Where this code is applicable under SECTION 3 and before a building or facility or an addition to a building or facility is constructed or erected, and before a building or facility is altered or relocated, or building equipment is installed therein, drawings and specifications relating to the work and equipment under consideration shall be prepared in conformity with SECTION 13 of this code and be submitted to the Commissioner for inspection, except that no drawings or specifications need be filed for alterations to or extensions of building service equipment which are performed under the supervision or direction of a professional engineer or registered architect, or for minor repairs.

SECTION 12. DRAWINGS & SPECIFICATIONS, WHEN AND WHERE TO FILE

Prior to beginning the construction or erection of any building or facility for which drawings and specifications are required under SECTION 11 of this code, the owner thereof or his agent shall submit not less than two copies of said drawings and specifications to the Commissioner of Labor and Industry, Montpelier, Vermont for approval.

SECTION 13. DRAWINGS & SPECIFICATIONS TO BE ADEQUATE

- (a) Drawings required under SECTION 11 shall be drawn to scale and shall be sufficiently clear comprehensive, detailed and legible when submitted to the Commissioner so that, together with any accompanying specifications and data, a person who is competent in such matters can readily determine whether or not the proposed building, addition, or alteration, and all proposed building equipment will conform in safety to all applicable provisions of this code.
- (b) The live loads used in the design of the building shall be tabulated on the drawings for all work to which such drawings apply.

SECTION 14. DRAWINGS AND SPECIFICATIONS, REQUIRED EVIDENCE OF RESPONSIBILITY

Drawings and specifications when submitted for inspection as required under SECTION 11, shall bear the identification of the person primarily responsible for their preparation and for the provisions for safety shown therein.

SECTION 15. DRAWINGS AND SPECIFICATIONS, INSPECTION OF

The Commissioner shall examine drawings and specifications for compliance with this code when they are submitted to him for approval. Within sixty (60) days from date of receipt, the Commissioner's office shall have an initial contact with the applicant for the purpose of granting approval, conditional approval with recommendations, if any, or disapproval as the case may be. Such contact however made shall always be confirmed in writing.

SECTION 16. DRAWINGS AND SPECIFICATIONS, APPROVAL OF

- (a) When the Commissioner finds that the drawings and specifications submitted to him for approval under SECTION 11 conform to the applicable provisions of this code, he shall endorse or stamp such drawings and specifications as approved by the Commissioner.

SECTION 16. (cont'd)

- (b) Nothing in this code shall be construed to prevent the Commissioner from issuing a conditional approval for the construction of part of a building or structure before the entire drawings and specifications of said building or structure have been submitted or approved, provided adequate information and detailed statements have been submitted for the same and have been found to comply with this code.
- (c) Every approval issued is conditioned upon:
- (1) Construction being started within six months from the issue date of the approval.
 - (2) Construction not being discontinued or suspended for a period of more than one year.

SECTION 17. DRAWINGS & SPECIFICATIONS, REVOCATION OF APPROVAL OF

The Commissioner may revoke an approval issued if any violation of this code is found upon inspection or in case there has been any false statement or misrepresentation as to a material fact in the drawings and specifications on which the approval was based.

SECTION 18. DRAWINGS AND SPECIFICATIONS, APPROVED SET REQUIRED

- (a) One set of drawings and specifications approved under SECTION 16 shall be returned to the owner and shall be kept at the site of the work for which the drawings and specifications were approved and shall be available for reference by the Commissioner at all times during working hours while such work is in progress.
- (b) The Commissioner shall stamp or endorse additional sets of drawings and specifications which have been approved by him, in addition to the two sets required under SECTION 12, when so requested by the owner or his agent.

SECTION 19. DRAWINGS AND SPECIFICATIONS, CONFORMITY TO

The construction, erection, and alteration of a building, and any addition thereto, and the equipment and maintenance thereof shall conform to required drawings and specifications which have been approved by the Commissioner, except for minor deviations which do not involve a violation of this code.

SECTION 20. SPECIAL SUPERVISION, WHERE REQUIRED

Where, in the opinion of the Commissioner, the work covered by approved drawings and specifications involves construction or equipment which is hazardous or complex or for other good reason requires special or expert supervision, the Commissioner may require the architect who signed such drawings and specifications or professional engineer who affixed his seal thereto, or made the plans or computations for such work, to provide special inspection of the work involved and to certify upon completion that the work is done in substantial conformity with the approved drawings and specifications as they relate to safety. Where such architect or professional engineer is not available, another architect or professional engineer, or other qualified person shall perform the required special inspection.

SECTION 21. INSPECTION

If the drawings and specifications for the erection, construction, repair, alteration, relocating or equipment of a building are subject to inspection by the Commissioner under SECTION 11, he shall make or cause to be made such inspection, investigations, and determinations as are necessary to determine whether or not the work which has been performed and the installations which have been made are in conformity with the approved drawings and specifications relating thereto, except to the extent special inspection is provided under SECTION 20.

SECTION 22. LIABILITY FOR DAMAGES

The code shall not be construed to hold the Commissioner responsible for any damage to persons or property by reason of the inspection or reinspection authorized herein or failure to inspect or reinspect or the approval of drawings and specifications as herein provided or by reason of the approval or disapproval of any equipment authorized herein.

SECTION 23. PENALTIES

Every person who fails to comply with any provisions of this code or who fails to carry out an order made under this code or any condition attached to an approval or to which an approval is subject is guilty of an offense and shall be subject to prosecution as provided for in Title 20 V.S.A. 2727, or 3021 (c), as the case may be.

SECTION 24. CONFIDENTIAL INFORMATION

Any information necessarily required by the Commissioner or his representative which shall be of a confidential, proprietary or trade secret nature, shall be treated as confidential when so identified.

SECTION 25. EFFECTIVE DATE

- (a) These rules and regulations shall become effective July 11, 1973 and shall not be retroactive except when conditions exist which which are inimical to fire prevention and public safety.
(20 V.S.A. 251-264)
- (b) These rules shall not apply:
 - (1) To designs begun before January 1, 1972, if such design will be completed and submitted for approval to the Fire Marshal or before June 30, 1972 and a letter of intent to submit such designs is received by the Fire Marshal or before the effective date of these rules;

SECTION 25 Effective Date (cont'd)

- (2) To construction begun on or before January 1, 1972 and completed by June 30, 1972, when design plans for such construction were submitted to and approved by the Fire Marshal before the effective date of the rules and no subsequent changes have been made.

These regulations have been adopted by the Commissioner of Labor and Industry pursuant to 21 V.S.A. 252 & 262. They shall become effective on July 11, 1973.

LOUIS LAVIN,

Commissioner



STATE OF VERMONT
DEPARTMENT OF LABOR AND INDUSTRY
MONTPELIER

June 22, 1973

Honorable Richard Thomas
Secretary of State
Pavilion
Montpelier, Vermont

Dear Secretary Thomas:

Pursuant to Title 3, VSA, Section 804, the attached rules and regulations are adopted to be effective July 11, 1973, as follows:

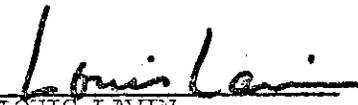
1. PART 1903 - Inspections, Citations and Proposed Penalties
2. PART 1904 - Recording & Reporting Occupational Injuries & Illnesses
3. PART 1905 - Rules of Practice for Variances, Limitations, Variations, Tolerances and Exemptions
4. PART 1000 - Work-Life Standard
5. Safety & Health Standards for Maritime Employment
6. Safety & Health Regulations for Construction
7. Occupational Safety & Health Standards for General Industry.

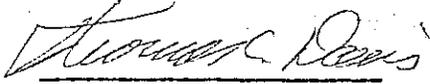
Items 1 thru 7 are adopted jointly by the Secretary of Human Services and the Commissioner of Labor & Industry.

8. Regulations for Elevators, Escalators, Dumbwaiters and Moving Walkways
9. Vermont Fire Prevention Code
10. Boiler and Unfired Pressure Vessel Rules & Regulations

Items 8 thru 10 are adopted solely by the Commissioner of Labor & Industry.

Sincerely,


LOUIS LAVIN
Commissioner
Department of Labor & Industry


THOMAS DAVIS
Secretary
Agency of Human Services

*These materials filed
in drawer "H".
(OSHA)*