



Town of Littleton Fire Department Office of Fire Prevention

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"Protection of life and property through a combination of emergency response and loss prevention services"

October 24, 2022

To: Maren Toohill

From: Deputy Chief Thomas Clancy

Subject: Proposed Recycling Facility at Spring Dell Farm

*Littleton Planning Board
OCT 24 2022
Received*

Good Morning Maren:

I have reviewed the proposed facility at 571 Great Road and want to bring forth to the Planning Board's attention a couple of items. There is a chapter in 527 CMR 1.00 Massachusetts Comprehensive Fire Safety Code 2015 edition that pertains to their proposed operation.

Chapter 31 Forest Products was designed for guidance on the outside storage of forest products. I have attached a section of Chapter 31 that I believe is relevant to the proposed operation at Spring Dell Farm. It covers the outside storage of wood chips and hogged material which is another designation for stumps.

The Google map provided in the packet shows a body of water on the property. I would also ask that they provide a road for access to the water source that can handle the weight of a fire truck. I would be willing to visit the site with the applicant and go over access. The road they are proposing for the storage and processing area is more than adequate for our vehicles.

This office is not against the proposed project and will work with the applicant to ensure adherence to Chapter 31.

Let me know if there is anything else you need.

31.3.5.3.1.3 Where an alleyway width less than 4 ft (1.2 m) is provided, the length of the rows shall be not more than 75 ft (23 m).

31.3.5.3.2* Water supplies shall be provided in accordance with this *Code*.

31.3.5.3.3 Access to the plant and yard from public highways shall be provided by all-weather roadways capable of supporting fire department apparatus.

31.3.5.3.4 The storage site shall be reasonably level, on solid ground, and paved or surfaced with materials such as cinders, fine gravel, or stone.

31.3.5.3.5* Stack heights shall be limited to 20 ft (6 m).

31.3.6 Outside Storage of Wood Chips and Hogged Material.

31.3.6.1* Application. The requirements of 31.3.6 shall apply to yard storage areas containing wood chips and hogged material.

31.3.6.2 General.

31.3.6.2.1* The fire hazard potential inherent in storage piles shall be controlled by a positive fire prevention program under the direct supervision of upper level management that shall include the following:

- (1) Selection, design, and arrangement of storage yard areas and materials-handling equipment based upon sound fire prevention and protection principles
- (2) Establishment of control over the various factors that lead to spontaneous heating, including provisions for monitoring the internal condition of the pile
- (3) Means for early fire detection and extinguishment
- (4) Fire department access roads around the piles and access roads to the top of the piles for effective fire-fighting operations
- (5) Facilities for calling the public fire department and facilities needed by the fire department for fire extinguishment
- (6) Effective fire prevention maintenance program, including regular yard inspections by trained personnel

31.3.6.2.2* The following items shall be addressed when establishing operating procedures:

- (1) The storage site shall be reasonably level, solid ground, or shall be paved with blacktop, concrete, or other hard-surface material.
- (2) Sites shall be cleaned before transferring wood products to the site.
- (3) Operating plans for the buildup and reclaiming of the pile shall be based on a turnover time of not more than 1 year under ideal conditions.
- (4) (4)*Piles containing other than screened chips made from cleaned and barked logs shall be minimized.
- (5) *The pile size shall be limited.
- (6) Pile heights shall be kept low, particularly piles that inherently carry a larger percentage of fines and are subject to greater compaction.
- (7) Thermocouples shall be installed during pile buildup, or other means for measuring temperatures within the pile shall be provided with regular (normally weekly) reports to management.

(8) *The pile shall be wetted regularly to help keep fines from drying out and help maintain the moisture content of the surface layer of the pile.

31.3.6.3* Pile Protection.

31.3.6.3.1* Piles shall be constructed with an access roadway to the top of the pile in order to reach any part of the pile.

31.3.6.3.2* Piles shall not exceed 60 ft (18 m) in height, 300 ft (90 m) in width, and 500 ft (150 m) in length.

31.3.6.3.2.1 Where pile height and width are such that all portions of the pile cannot be reached by direct hose streams from the ground, arrangements shall be made to provide firefighting service in these areas, and small fire stream supplies shall be available on the top of the pile for handling small surface fires and for wetting the pile in dry weather.

31.3.6.3.2.2 When more than one pile exists, they shall be subdivided by fire department access roads having not less than 30 ft (9 m) of clear space at the base of the piles.

31.3.6.3.2.3 Low barrier walls around piles shall be provided to clearly define pile perimeters, prevent creeping, and facilitate cleanup of fire department access roads.

31.3.6.3.3 Where suitable, a small, motorized vehicle amply equipped with portable extinguishing equipment or a water tank and pump shall be provided.

31.3.6.3.3.1 Lightweight ladders that can be placed against the side of the pile shall be placed at convenient locations throughout the yard for use by the plant emergency organization.

31.3.6.3.3.2 Training of the plant emergency organization also shall include procedures and precautions to be observed by yard crews employing power equipment in fighting internal fires.

31.3.6.3.4* Portable fire extinguishers for Class A fires shall be provided in accordance with Section 13.6 on all vehicles operating on the pile in addition to the normal Class B units for the vehicle.

31.3.6.3.5* Water supplies shall be provided in accordance with this *Code*.

31.3.6.3.6 All motor and switchgear enclosures shall be provided with approved, portable fire extinguishers suitable for the hazard involved in accordance with Section 13.6.

31.3.6.3.7* Power-operated, shovel-type or scoop-type vehicles, dozers, or similar equipment shall be available for use in moving stored material for fire fighting.

31.3.6.3.8 Temporary conveyors and motors on the surface or adjacent to the piles shall not be permitted.

31.3.6.3.9 Physical protection shall be provided to prevent heat sources such as steam lines, air lines, electrical motors, and mechanical drive equipment from becoming buried or heavily coated with combustible material.

31.3.6.3.10 Tramp metal collectors or detectors shall be required on all conveyor and blower systems.

31.3.6.4 Exposure Protection.

31.3.6.4.1* Incinerators or open refuse burning shall not be permitted in any area where sparks could reach the storage piles.

31.3.6.4.2* A clear space of not less than 15 ft (4.6 m) shall be maintained between piles and exposing structures, yard equipment, or stock, depending on the degree of exposure hazard.

M 31.3.6.4.3* Property line clearance of not less than 30 ft (9 m) 25 ft (7.62m) at the base of the pile shall be provided.

A 31.3.6.5 **Emergency Action Plan.** The facility shall have an emergency action plan for monitoring, controlling, and extinguishing spot fires.

31.3.7* Storage and Processing of Wood Chips, Hogged Material, Fines, Compost, and Raw Products at Yard Waste Recycling Facilities.

31.3.7.1 The storage and processing of wood chips, hogged material, fines, compost, and raw products produced from yard waste recycling facilities shall comply with 31.3.6 and 31.3.7.

31.3.7.2 When not protected by a fixed fire-extinguishing system in accordance with Chapter 13, piles shall not exceed 25 ft (7.6 m) in height, 150 ft (45 m) in width, and 250 ft (76.2 m) in length.

31.3.7.3 Static Pile Protection.

31.3.7.3.1 Static piles shall be monitored by an approved means to measure temperatures within the piles.

31.3.7.3.2 Internal pile temperatures shall be recorded weekly.

31.3.7.3.3 Records shall be kept on file at the facility and made available for inspection.

31.3.7.3.4 The facility shall have an operational plan indicating procedures and schedules for the inspection, monitoring, and restricting of excessive internal temperatures in static piles.

31.3.7.4 Fire Protection.

31.3.7.4.1 Conveyor tunnels and combustible enclosures that pass under a pile shall be protected with automatic sprinklers complying with Section 13.3.

31.3.7.4.2 Combustible or enclosed conveyor systems shall be protected with automatic sprinklers complying with Section 13.3.

31.3.8 Outside Storage of Logs.

31.3.8.1 Application.

31.3.8.1.1* The requirements of 31.3.8 shall apply to log yard storage areas containing saw, plywood veneer, or pulpwood logs stored in ranked piles commonly referred to as cold decks.

31.3.8.1.2 The requirements of 31.3.8 shall not apply to cordwood.

31.3.8.2* **General.** The fire hazard potential inherent in log storage operations with large quantities of combustible materials shall be controlled by a positive fire prevention program under the direct supervision of upper level management that shall include the following:

- (1) Selection, design, and arrangement of storage yard areas and materials-handling equipment based on sound fire prevention and protection principles
- (2) Means for early fire detection, transmission of alarm, and fire extinguishment
- (3) Fire department access roads to separate large piles and provide access for effective fire-fighting operations
- (4) Separation of yard storage from mill operations and other exposing properties
- (5) Effective fire prevention maintenance program, including regular yard inspections by trained personnel

31.3.8.3* Log Yard Protection.

31.3.8.3.1 The storage site shall be reasonably level, on solid ground, and paved or surfaced with materials such as cinders, fine gravel, or stone.

31.3.8.3.2 Access to the plant and yard from public highways shall be provided by all-weather roadways capable of supporting fire department apparatus.

31.3.8.3.3* All sides of each cold deck shall be accessible by means of fire department access roads.

31.3.8.3.3.1 A fire department access road width of 1½ times the pile height but not less than 20 ft (6 m) shall be provided, with fire department access roads between alternate rows of two pile groups providing a clear space of at least 100 ft (30 m).

31.3.8.3.3.2* Each cold deck shall not exceed 500 ft (150 m) in length, 300 ft (90 m) in width, and 20 ft (6 m) in height.

31.3.8.3.3.3* Fire department access roads for access across each end, with a clear space of not less than 100 ft (30 m) to adjacent pile rows or other exposed property, shall be provided.

31.3.8.3.3.4* The size of cold decks shall be permitted to be increased where additional fire flow and fixed fire protection equipment is provided and the approval of the AHJ is obtained.

31.3.8.3.4 Water supplies shall be provided in accordance with this *Code*.

31.3.8.3.5 Dynamite shall never be used as a means to reclaim frozen log piles.

31.3.8.3.6* During dry weather, piles shall be wet down.

31.3.9 **Wood Processing and Woodworking Facilities.** Dust control shall be in accordance with NFPA 664 for combustible dust-producing operations that occupy areas of more than 5000 ft² (464 m²), or to areas where dust-producing equipment requires an aggregate dust collection flow rate of more than 1500 ft³/min (2549 m³/hr).

Chapter 32 Motion Picture and Television Production Studio Soundstages and Approved Production Facilities

32.1 General. The design, construction, operation, and maintenance of soundstages and approved production facilities used in motion picture and television industry productions shall comply with NFPA 140, *Standard on Motion Picture and Television Production Studio Soundstages, Approved Production Facilities, and Production Locations*, and Chapter 32.

32.1.1 Terms. As used in Chapter 32 the enclosed terms shall have the following meaning assigned to them.

(1) On-Site Personnel. Cast, crew, vendors, contractors, and any other personnel servicing the production.

32.2 Permits. Permits, where required, shall comply with Section 1.12.

32.3 Housekeeping. Soundstages and approved production facilities shall maintain housekeeping in accordance with Chapters 10 and 19 where applicable.

32.4 Soundstages and Approved Production Facilities.

32.4.1 General. Section 32.4 shall apply to new and existing motion picture and television soundstages and approved production facilities. [140: 4.1]

32.4.2 Permits. Where required by the AHJ, a permit shall be obtained for any activities that follow.