

Master Fire Safety: Advanced Compliance for Building Operators in Ontario



1



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2




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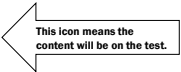
3

Unit 1
Fire Safety Plan Fundamentals








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4


Unit 1 Objectives   This icon means the content will be on the test.

A Fire Safety Plan is not just a binder on a shelf. It is a detailed, active document specific to this property. It's a reference manual for:

-  **What is it?** What is a Fire Safety Plan and why is it critical?
-  **How to Create It:** The 10-step process.
-  **How to Use It:** Emergency procedures and fire drills.
-  **How to Implement & Maintain It:** Your specific responsibilities.

5 


5

What is a Fire Safety Plan? 

A Fire Safety Plan is not just a binder on a shelf. It is a detailed, active document specific to this property.

It's a reference manual for:

- Emergency Procedures:** What to do in a fire.
- Staff Training:** Who is responsible for what.
- Fire Hazard Control:** How we prevent fires from starting.
- Maintenance:** A schedule for all fire protection equipment.

6 

6

Why Is This Plan So Important?

Life Safety: It reduces the risk of injury to all occupants.


Compliance: It is required by law under the Ontario Fire Code (O. Reg. 213/07).

Effectiveness: It coordinates our staff and the Fire Department for a fast, effective response.

Protection: It reduces the potential for massive dollar losses, liability, and business interruption.

Besides the obvious risk to life, what's the biggest impact a major fire could have on our specific operations here?

7




7

The 10-Step Process to a Complete Plan

1. Conduct a Fire Safety Audit
2. Appoint & Organize Supervisory Staff
3. Develop Emergency Procedures
4. Establish Fire Drill Procedures & Training
5. Schedule Maintenance of All Equipment
6. Plan Alternate Measures for Shutdowns
7. Control Fire Hazards
8. Ensure Fire Department Access
9. Prepare Schematic Diagrams
10. Post Emergency Information





8



8


Step 1: Conduct a Fire Safety Audit

We must know what we are protecting. The plan is built on this audit.

 <p>Property Audit</p> <p>Site plans, access routes, hydrants, utility shut-offs (gas, electrical).</p>	 <p>Building Audit</p> <p>Construction, fire separations, exits, and all fire systems (alarms, sprinklers, etc.).</p>	 <p>Human Resources</p> <p>Staff numbers on all shifts. Persons requiring assistance.</p>	 <p>Hazard Audit</p> <p>Flammable liquids, compressed gases, combustible dusts, etc.</p>
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Can anyone name one potential fire hazard they've seen in their daily walk-around of the building?

9



9

Step 2: Appoint Supervisory Staff


This is Us. Building Operations Staff are the core of the "Supervisory Staff". The plan must officially appoint qualified staff (and alternates) for fire safety duties.

Our Responsibilities Include:


- Carrying out defined emergency procedures.
- Ensuring occupant safety and evacuation.
- Meeting and assisting the arriving Fire Department.
- Knowing the building systems inside and out.

All Employees must be trained on:

- What to do upon discovering a fire.
- What to do upon hearing an alarm.



10



10

Step 3: Develop Emergency Procedures

Upon DISCOVERY of Fire


- Leave the fire area immediately. Assist anyone in danger.
- Close all doors behind you. (Confines the fire)
- Activate the nearest Fire Alarm.
- Call the Fire Department.

Upon HEARING the Fire Alarm

- Safely shut down critical process equipment (if trained).
- Evacuate the building via the nearest exit.
- DO NOT USE ELEVATORS.
- Proceed to the designated assembly area.

What are the two things you must do immediately after leaving the fire area?

11




11

Step 4: Fire Drills & Training

A plan is useless without practice.

- ✎ **Training:** All supervisory staff must be instructed on their specific duties before they are given responsibility.
- ✎ **Fire Drills:** Must be held at least once every 12 months. All supervisory staff must participate to test the plan and our response.
- **Documentation:** We must record the date, time, and participants of every drill and keep records for at least one year.

12




12

Step 5: Maintenance of Equipment

The Fire Safety Plan must contain a detailed schedule for the check, inspection, and test of all fire protection systems. We must keep records for at **least two years**.

- 🔔 Fire Alarm Systems
- 🚒 Sprinkler & Standpipe Systems
- 🧯 Portable Fire Extinguishers
- 💡 Emergency Lighting
- 🚪 Exit Signs
- 🚪 Fire Doors and Separations

13



13

Step 6: Alternate Measures (Shutdowns)

If the Fire Alarm System is down:


- Notify all supervisory staff.
- Appoint a "Fire Watch" to patrol the affected areas.
- Have a method to notify occupants (e.g., air horns, PA system).

If the Sprinkler System is down:

- Notify the Fire Department (non-emergency line).
- Notify all supervisory staff.
- Prohibit all "Hot Work" (welding, cutting, grinding).
- Establish a Fire Watch until the system is back online.

A contractor needs to shut down sprinklers in Zone 3. What are your first three actions?

14



14

Step 7: Control of Fire Hazards

This is proactive fire prevention. Our job is to identify and control hazards.

The plan must include procedures for:

- Safe storage and handling of flammable liquids.
- Controlling smoking and designated smoking areas.
- Hot Work Permits: Managing all cutting, welding, or grinding.
- Safe battery charging for forklifts or other equipment.
- Preventing build-up of combustible dusts.
- Keeping storage orderly and not blocking exits or equipment.

What is the most common fire hazard you see in your specific area?






15




15

Steps 8-10: Access, Diagrams & Posting

 <p>Fire Dept. Access</p> <p>Ensure fire routes are clear 24/7. A designated staff member (Us) must meet firefighters with keys, access codes, and the Fire Safety Plan. A "Lock Box" is essential.</p>	 <p>Schematic Diagrams</p> <p>The plan must include clear drawings showing locations of: Exits, pull stations, extinguishers, utility shut-offs, and fire system controls (panel, valves).</p>	 <p>Posting Information</p> <p>Post Emergency Procedures on every floor. Keep the complete, approved Fire Safety Plan in the designated location (e.g., Fire Panel Room or Security Desk).</p>
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16



16

Implementation & Updating the Plan


The plan is a living document. It is never "finished."

Our Ongoing Role is to:

- ▶ **Implement:** Ensure all training is done, drills are held, and maintenance schedules are followed.
- 🔄 **Review:** Review the entire plan at least once per year to ensure it is current.
- ✔ **Update:** The plan **MUST** be updated and re-approved by the Chief Fire Official any time there is a change (e.g., renovations, new hazards, new staff).

Can you think of a recent change in our building that would require a review of the Fire Safety Plan?

17




17

Summary

Building Operations is responsible for the plan's most critical elements:


- ✔ Maintenance of Systems
- ✔ Managing System Shutdowns
- ✔ Controlling Fire Hazards
- ✔ Assisting the Fire Department
- ✔ Keeping the plan current.

18



18

Unit 2
Navigating the Ontario Fire Code




19

Unit 2 Objectives


By the end of this session, you will be able to:

- **Understand Your Legal Role:** Define your responsibilities under the OFC.
- **Navigate the Code:** Access the e-Laws site and understand its structure.
- ⦿ **Master Part 2:** Identify daily duties for fire prevention and safe exit routes.
- **Master Part 6:** Understand ITM requirements for your core systems.
- **Master Part 7:** Learn the additional monthly testing for high-rise systems.

20



20


What is the Ontario Fire Code? 

Official Title: Ontario Regulation 213/07, made under the Fire Protection and Prevention Act, 1997.

What it is: A regulation that sets the minimum requirements for fire safety in new and existing buildings in Ontario.

Who is Responsible? "Unless otherwise specified, the owner is responsible..." (Div A, 1.2.1.1.). As a building operator, you act as the owner's representative.

21



21

How the Code is Structured

Division A

Compliance & Objectives. This is the administrative part. It outlines who is responsible and the core objectives the Code aims to achieve.

Division B

Acceptable Solutions. This is the technical core. It provides the specific, detailed rules you must follow. We focus on Parts 2, 6, and 7.

Division C

Administrative Provisions. This section covers enforcement, offences, and qualifications for fire officials.

22

22

How to Access the Fire Code

The Fire Code is available to the public for free on the Ontario e-Laws website.

e-Laws is the official online source for all current Ontario laws and regulations.

Direct Link:
<https://www.ontario.ca/laws/regulation/070213>

Tip: Use the table of contents on the e-Laws page to navigate directly to the Part and Section you need. You don't have to read it front-to-back.

23

23

OFC Part 2: Fire Safety

Core Idea: This part is about preventing fires from starting and ensuring people can get out safely if one occurs.

24

24

OFC Part 2: Building Features

1. Fire Separations (Sec 2.2)

What: Fire-rated walls, floors, doors, and dampers that stop smoke and fire.

Your Job:

- NEVER prop or wedge fire doors open.
- MAINTAIN all hardware (closures, latches).
- PROTECT the barrier. Ensure all new penetrations (pipes/wires) are properly fire-stopped.


2. Means of Egress (Sec 2.5)

What: The continuous, clear path to get outside (corridors, stairwells, exit doors).

Your Job:

- KEEP CLEAR: All exit paths must be 100% free of obstructions. No storage, no garbage.
- KEEP LIT: Ensure all exit signs and emergency lighting are functional.
- KEEP UNLOCKED: Exit doors must open from the inside with a single, simple motion.

25



25

OFC Part 2: Operations & Plans

3. Fire Hazards (Sec 2.4)

What: Controlling the fuel and ignition sources that cause fires.

Your Job:

- **Housekeeping:** Prevent "undue accumulation" of combustible waste in service rooms, corridors, etc.
- **Storage:** Keep it stable and not blocking electrical panels or fire equipment.


4. Fire Safety Plans (Sec 2.8)

What: Your building's "bible" for all emergency procedures and maintenance.

Your Job:

- **Implement:** Train staff, run drills, and perform all checks.
- **Keep Current:** Review at least every 12 months.
- **Keep Accessible:** Keep the approved plan in its box at the main fire alarm panel.

26




26

OFC Part 6: Fire Protection Equipment

Core Idea: This is your "Inspection, Testing, and Maintenance (ITM)" manual. Your logbook is your legal proof of compliance.

27



27

OFC Part 6: ITM (First Response)

Fire Extinguishers (Sec 6.2)

Monthly Visual Check:

- Is it in its proper location?
- Is it unobstructed and visible?
- Is the pin in place?
- Is the pressure gauge in the green?

Annual Maintenance: By certified external contractor.

Fire Alarm System (Sec 6.3)

Daily Check:


- Visually check main panel for "Trouble" or "Supervisory" signals. Investigate and log.

Monthly Test:

- Test at least one device (e.g., pull station) on a rotating basis.

Annual Test: Full system test by certified contractor.

28



28

OFC Part 6: ITM (Water Systems)

Sprinkler Systems (Sec 6.5)

Weekly/Monthly Checks:

- Check control valves are OPEN and secured.
- Check pressure gauges are in normal range.

System Shutdowns:

- Notify Fire Dept. & monitoring co.
- Notify occupants.
- Implement a "Fire Watch".

Fire Pumps (Sec 6.6)


Weekly Test:

- Pumps must be run weekly (e.g., 30-min test) to ensure they start and run smoothly.

Weekly Checks:

- Check diesel fuel levels.
- Check battery chargers.
- Ensure pump room heater is working (must stay above 4°C).

29



29


OFC Part 7: Systems in High Buildings

This part applies if your building is over 18m (approx. 6-7 storeys) for residential/care, or over 36m (approx. 12+ storeys) for office/commercial.

These requirements are in addition to everything in Part 6.


- **Group B (Care) or C (Residential):** Applies if highest occupied floor is > 18m above grade.
- **Group A, D, E, F (Office, etc.):** Applies if building is > 36m high OR > 18m high with high occupant load.





30




30

OFC Part 7: Your Monthly ITM Responsibilities



 <p>CACF</p> <p>Ensure your "command room" is accessible and all systems reporting to it are functional.</p>	 <p>Voice Communication</p> <p>Activate the mic and test the speaker system on at least one floor (rotate) to ensure it is clear.</p>	 <p>Smoke Control</p> <p>Activate the system (key switches) and confirm the correct fans (pressurization, exhaust) turn on.</p>	 <p>Firefighter's Elevators</p> <p>Test Phase 1 (Recall) from the lobby. Test Phase 2 (In-Car Service) with the key inside one car.</p>
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31




31

Key Takeaways

- ✔ **You are Responsible:** You are the "owner's" agent for ensuring daily compliance.
- ✔ **Part 2 (Fire Safety):** Is about Housekeeping, Clear Exits, and Fire Separations.
- ✔ **Part 6 (Fire Protection):** Is your ITM manual. Key checks are Daily (panel), Monthly (alarms, extinguishers), and Weekly (fire pump).
- ✔ **Part 7 (High Buildings):** Adds Monthly tests for Voice Comm, Smoke Control, and Firefighter Elevators.

32



32

The Golden Rule

“ Log Everything: Your logbook is your proof of compliance. In the eyes of the law, if it isn't written down, it didn't happen. ”


— Every Fire Inspector

33



33

Unit 3
ITM Documentation & Record Management




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Why Does This Matter?


It's not just paperwork. It's about the 3 C's:
Compliance. Culpability. Continuity.

35 

35





The OFC Mandate: Core Requirements

- Records must be kept for all inspections, tests, and **corrective measures** of fire protection systems.
- All records must be kept **at the building premises** and be available for examination by the Chief Fire Official.
- Records must be retained for **at least two years** (current and previous record).
- **EXCEPTION:** Initial verification and test reports for new systems must be retained for the **life of the system**.
- **Proof of Deficiency Resolution:** Updated reports or work orders showing a deficiency was fixed must be kept with the original report.


36 

36

Key Definitions: Know the Lingo

 CHECK	 TEST	 INSPECT	 MAINTENANCE
<p>A visual observation to ensure the device or system is in place and is not obviously damaged or obstructed.</p>	<p>The operation of a device or system to ensure that it will perform in accordance with its intended function.</p>	<p>A physical examination to determine that the device or system will apparently perform in accordance with its intended function.</p>	<p>Work performed to keep equipment operable and in good repair.</p>

37


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General Building Requirements (OFC)

- Fire Doors:** CHECK Daily to ensure they remain closed (unless on a hold-open device).
- Exit Doors:** TEST Monthly to ensure they are operable and unblocked.
- Fire Separations:** MAINTAIN ongoing. Repair any damage to walls/ceilings to maintain integrity.
- Means of Egress:** MAINTAIN ongoing. Keep corridors, stairs, and exits free of obstructions and snow/ice.
- Fire Dept. Access:** MAINTAIN clear access for fire trucks and personnel at all times.
- Fire Dept. Connections:** MAINTAIN free of obstructions (e.g., snow, storage).
- Ventilation Systems:** INSPECT Weekly for accumulation of combustible deposits (e.g., dust).
- Door Hardware:** MAINTAIN latches, locks, and release hardware in good working condition.

38


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System Requirements: Fire Alarm & Voice Comms


<p>Building Operator Tasks</p> <ul style="list-style-type: none"> Daily: CHECK panel for trouble lights (principal and remote) and AC power-on light. Monthly: TEST system on emergency power (e.g., during generator test). Monthly: TEST voice communication system (paging) if part of the fire plan. 	<p>Qualified Contractor Tasks</p> <ul style="list-style-type: none"> Annual: Full Inspection & Test of entire system as per CAN/ULC-S536. Annual: Test voice communication system. 10-Year: TEST smoke detectors for sensitivity (if not automatically tested by the panel).
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39


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39


System Requirements: Emergency Lighting & Exit Signs


Ongoing (Occupied)

CHECK to ensure all exit signs are properly illuminated.



Monthly

TEST self-contained units (push test button for 30 seconds), INSPECT battery backup signs.


Annual


TEST all units for their full design duration (e.g., 30 minutes) by simulating a power failure.

40

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System Requirements: Emergency Generators



Weekly

INSPECT (all facilities).


TEST (Health Care facilities).


Monthly

TEST under load (all other facilities). This is typically coordinated with the fire alarm test.


Semi-Annual / Annual


Full inspection, load testing, and maintenance as per CSA C282 by a qualified contractor.


Who is Qualified?

Weekly/Monthly: Trained building operator.

All other: Manufacturer-trained or post-secondary qualified person.

41

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41

System Requirements: Water-Based Systems (Sprinklers)


Building Operator Tasks

- **Weekly:** INSPECT gauges on dry, preaction, and deluge systems.
- **Weekly:** INSPECT sealed control valves.
- **Monthly:** INSPECT gauges on wet pipe systems.
- **Quarterly:** INSPECT Fire Department Connections (FDC).

Qualified Contractor Tasks

- **Quarterly:** TEST waterflow alarm devices (e.g., flow switch).
- **Annual:** Full ITM of all components (valves, heads, alarms, piping) per NFPA 25.
- **5-Year:** Internal piping condition assessment.
- **5-Year+:** Laboratory testing of sample sprinkler heads.

42


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42

System Requirements: Water-Based (Standpipe & Pumps)





<p>Fire Pumps</p> <ul style="list-style-type: none"> ● Weekly: INSPECT pump room, diesel fuel, etc. ● Weekly: Run TEST (Diesel pumps, no-flow). ● Monthly: Run TEST (Electric pumps, no-flow). ● Annual: Full flow test by qualified contractor. 	<p>Standpipe & Hose</p> <ul style="list-style-type: none"> ● Monthly: INSPECT hose cabinets (check for hose, nozzle, accessibility). ● Annual: Full ITM by qualified contractor. ● 5-Year: Flow test and hydrostatic test of standpipe. ● 5-Year: Hydrostatic test of fire hoses.
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43




43

System Requirements: Portable Fire Extinguishers



<p> Monthly (By Operator)</p> <p>Visually inspect. Check:</p> <ol style="list-style-type: none"> 1. Location (in place) 2. Accessibility (unobstructed) 3. Pressure Gauge (in green) 4. No obvious damage <p>Sign the tag.</p>	<p> Annual (By Contractor)</p> <p>Full maintenance, inspection, and test by a qualified person. New tag applied.</p>	<p> 6-Year</p> <p>Extinguishing agent is replaced (maintenance).</p>	<p> 5 / 12-Year</p> <p>Hydrostatic testing of the cylinder (frequency depends on extinguisher type).</p>
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44




44

System Requirements: Commercial Cooking

<p> Exhaust System (Hood & Duct)</p> <p>INSPECT for grease buildup at a set frequency (Monthly, 3-Month, 6-Month, or Annual) based on cooking volume.</p> <p>CLEAN if inspection determines a hazardous accumulation of grease.</p>	<p> Suppression System (NFPA 17A)</p> <p>INSPECT & MAINTAIN every 6 months by a qualified contractor.</p> <p>Check nozzle placement, fusible links, and manual activation.</p>
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45



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System Requirements: Special Cases

Electromagnetic Locks

Annual Test: Must verify that all locks release upon:

- Actuation of the fire alarm signal
- Loss of power
- Actuation of the manual release button
- Applying force to the exit hardware (may have 15-sec delay)

Integrated Systems

Annual/ 5-Year Test: Verifies all interconnected systems work together as designed.

Example: Fire alarm signal not only sounds alarm but also:

- Releases e-locks
- Recalls elevators
- Shuts down/starts fans

46

46

Documentation: Emergency Planning (Fire Safety Plan)

- 📄 A **Fire Safety Plan** must be prepared for most buildings and kept at the premises (e.g., in a fire plan box).
- 👤 Must appoint and train **Supervisory Staff** to carry out duties.
- 🔄 The plan must be **REVIEWED ANNUALLY** (at minimum) by the owner to ensure it is up to date.
- 🔥 **Fire Drills** must be held and documented. Frequency depends on occupancy (e.g., monthly for health care, 3x per term for schools, annually for others).

47

47

The Deficiency-Correction Loop

2. Document

The deficiency is immediately recorded in the logbook or contractor report.

4. Correct

The repair is performed by staff or a contractor.

1. Identify

An inspection or test finds a problem (e.g., "Unit 3B-E exit sign not lit").

3. Action

A work order is created and assigned for repair (e.g., "Create WO #12345").

5. Close

The work order is closed-out with full details (what, when, who). This is the final record.

48

48

Anatomy of a "Perfect" Record (Inspection & Work Order)

The Inspection Log

WHAT: Monthly Emergency Light Test

WHEN: Nov 5, 2025

WHO: J. Smith (Building Operator)

RESULT: Test FAIL. Unit 3B-E (West Stairwell) did not illuminate. All other units passed.

The Work Order (Corrective Measure)

WHAT: Replaced battery and bulb in Unit 3B-E exit sign.

WHEN: Nov 6, 2025

WHO: A. Johnson (ABC Electrical) - Inv #456

STATUS: Complete. Unit tested operational post-repair.

49

49

Digital vs. Paper Logbooks

Both methods are acceptable to the OFC, but must be maintained properly.

- **Paper Logbooks:** Must be legible (in ink), organized, and stored securely at the premises.
- **Digital Systems (CMMS):** Must be secure, backed-up, and able to produce a clear, time-stamped, and unalterable report.

CRITICAL: No matter the system, proof of deficiency resolution (the work order) must be kept with the original inspection report that found the problem.

50

50

A Key Takeaway


“ If it isn't written down, it didn't happen. ”

— Every Fire Inspector

51

51

Unit 4
Property Level Programs & Policies




52

Unit 4 Objectives


We will move from daily *tasks* to long-term *programs*.

You will learn to:

- Develop Standard Operating Procedures (SOPs).
- Implement a robust File Management Program.
- Contribute to Capital Planning & Lifecycle Management.
- Manage Fire Incident Data.
- Manage Hot Work & Fire Impairment Programs.
- Standardize Construction Specs & RFPs.


53 

53



Standard Operating Procedures (SOPs)

Turning "what to do" into "how we do it"

54 

54

Hot Work & Fire Impairment Programs
Managing high-risk, temporary conditions.

58 

58


Managing High-Risk Work

Hot Work Program
What: Any work using a flame or producing sparks (welding, grinding, roofing).
Your Program Must Include:

- **PERMIT:** Contractor fills out a permit *before* work begins. Permit is posted at the job site.
- **INSPECT:** You inspect the area. Remove all flammables (35ft radius).
- **PROTECT:** Ensure extinguishers are present. Cover drains/floors.
- **FIRE WATCH:** A trained person must watch for fire for 30-60 minutes *after* work stops and sign off on the permit.

Fire Impairment Program
What: Any fire system (sprinkler, alarm) is out of service.
Your Program Must Include:

- **NOTIFY:** Fire Dept. (non-emergency), Monitoring Co., and building occupants.
- **LOG:** All notifications (time, person spoken to) must be logged.
- **FIRE WATCH:** Implement "Alternate Measures" (e.g., Fire Watch patrols with radios).
- **DISABLE HOT WORK:** No hot work is permitted while sprinklers are off.
- **RESTORE & VERIFY:** Log the restoration time, notify all parties again, and *verify* the panel is "Normal".

59 

59

File Management Program
The "Golden Rule": If it isn't written down, it didn't happen.

60 

60

File Management: Organization & Format

Standardize Forms

All in-house checks must use a standard form or logbook. No scraps of paper. This creates a consistent, auditable record.

Your CMMS (Computerized Maintenance Management System) is the "best" tool for this, as it forces standard data entry and time-stamps every action.

Storage: Digital vs. Paper

Paper: Must be in binders, organized by system (Alarm, Sprinkler, etc.) and year. Kept at the property.

Digital: Secure server or CMMS. Must be backed up and producible for a Fire Inspector.

Work Orders: A "Closed" work order is the "best" record. It proves a deficiency was found AND fixed. Auditors look for this loop.

Project Files & Drawings


You must maintain a "Life of System" file for all equipment. This is the "Building's Memory".

This includes:

- As-Built Drawings
- Engineer's Verification Reports
- Operation & Maintenance Manuals

Keep these centrally (fire-rated cabinet) and have digital scans.

61



61

Standardization Programs

Creating consistency across all building activities.

62



62

Standardization Programs

Fire Incident Data

Log "every" fire alarm activation, even "false alarms."

Why? Data analysis. "We've had 4 'false alarms' in the parkade this year." This helps you identify "trends" and fix the "root cause" (e.g., sensor issue, car exhaust) before a real fire is ignored.

Construction Specs

Your building's "Rules for Construction" must be standardized to prevent future problems.

It should require all new projects (e.g., tenant fit-up) to use ULC-listed firestopping, installed by a certified contractor, and "inspected by you" before walls are closed.

RFP Scope of Work


Standardize your "Request for Proposal" for contractors to prevent low-ball bids that skip tests.

Bad RFP: "Quote for annual sprinkler inspection."

Good RFP: "Quote for all Annual ITM as per NFPA 25 and OFC, including main drain test, all flow switches, and valve inspections."

This ensures all bidders are quoting the same, complete job.

63




63

Key Takeaways


- ✔ Your job is more than just "checking boxes" — you are a program manager.
- ✔ **SOPs** create consistency.
- ✔ **Capital Plans** use your data to budget for the future.
- ✔ **Hot Work & Impairment Programs** are critical for managing high-risk situations.
- ✔ **File Management** is your legal proof of compliance. Work orders are your best friend.
- ✔ **Standardization** (Data, Specs, RFPs) makes your job easier and your building safer.

64



64

Unit 5
Due Diligence and Advanced Compliance




65

Unit 5 Objectives

- ✔ Define "Due Diligence" and its legal context.
- ✔ Understand *Fire Protection and Prevention Act (FPPA)* fines.
- ✔ Identify proactive steps to *prove* due diligence.
- ✔ Explore advanced compliance beyond the basic code.

66



66

What is "Due Diligence"?

Legal Defense

It means you took every reasonable precaution to prevent a violation. The burden of proof is on *you*.

Reasonable Precaution

It's not about being perfect; it's about *proving* you tried by taking all steps a reasonable person would.

Proof

If it's not documented, it didn't happen. Your logbooks are your most important legal tool.

67

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\$50K

For Individuals
(and/or 1 year in jail)

\$1.5M

For Corporations
(for subsequent offences)

The Legal Stakes: FPPA Fines

68

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**How to Avoid Fines:
Proving Due Diligence**

Your best defense is a file folder full of proof. This is what you show an inspector or a judge.

- 📁 **Documentation:** Logbooks, work orders, contractor reports.
- 📁 **Training:** Staff training records, SOPs, drill sign-in sheets.
- 📁 **Proactive Action:** Records of self-inspections, hazard reports, and the *corrective actions* taken.

LOG BOOK FOR
FIRE PROTECTION
EQUIPMENT MAINTENANCE


Bruce Luciani, M.A.

HEALTH & SAFETY management college


69

69


Beyond the Code
Proactive Fire Safety

70 

70

Proactive Strategy: Drills & Walkthroughs 


<p>In-House Drills</p> <ul style="list-style-type: none"> Go beyond the annual minimum requirement. Test specific, challenging scenarios (e.g., "Fire in Elec. Room," "Blocked Stairwell"). Use as a hands-on training tool for new staff. Document all drills and hold a "lessons learned" debrief after. 	<p>Fire Dept. Walkthroughs</p> <ul style="list-style-type: none"> *Invite* the local fire department for a non-inspection walkthrough. Show them your fire panel, sprinkler room, and unique hazards. Builds a positive, professional relationship. Gives them "building intelligence" for a real emergency.
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71 

71

Proactive Strategy: Inspections & Talks

<p>Toolbox Talks</p> <ul style="list-style-type: none"> Short (5-10 min) safety meetings. Topics: "Hot Work Dangers," "Clear Egress," "Reporting Hazards." Keeps safety top-of-mind for all staff. Document attendees and topic discussed. 	<p>Proactive Inspections</p> <ul style="list-style-type: none"> Tenant Inspections: Regularly check tenant spaces for compliance (e.g., storage, extinguishers). Post-Construction: *Crucial.* Inspect *before* contractors close walls. Check for proper firestopping and sealed penetrations.
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72 

72




Advanced Compliance
Standardizing Safety & Excellence

73




73

National Standardized Procedures

 National Standards Base your SOPs on NFPA standards (e.g., NFPA 25, 72) to set a high, consistent bar for all properties.	 Unified SOPs Creates a single "playbook" for all staff, ensuring tasks are done the same way, everywhere.	 Data & Tracking Allows for national-level performance tracking, risk analysis, and budgeting.
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74




74


Internal Checks & Audits

Don't wait for the Fire Inspector to find your problems.
Find them yourself.

- 🔍 **Internal Audits:** Have a regional manager audit the property, acting as a "friendly inspector."
- 🔍 **Third-Party Audits:** Hire an independent consultant to audit your programs and logbooks for gaps.
- 🔍 **Continuous Improvement:** Use audit findings to update SOPs and improve training.



75



75

Summary: Due Diligence is a Cycle

1. COMPLY
Meet the OFC minimums (ITM, Logs).

2. PROVE
Document everything (Drills, Training, Fixes).

3. ADVANCE
Go beyond the code (FD Walkthroughs, Audits).

4. IMPROVE
Use data to get safer (Review & Repeat).

76

76

Unit 6
Preparing for AHJs and Audits

77


Unit 6 Objectives

- ✓ Understand the AHJ inspection process and their authority.
- ✓ Analyze a case study of a failed inspection and its root causes.
- ✓ Master the "Deficiency-to-Correction" documentation loop.
- ✓ Differentiate between legal notices, orders, and fines.
- ✓ Build a proactive guide for "audit-ready" preparation.

78


78

Who is the "AHJ"?




Fire Department

The primary AHJ for the Ontario Fire Code. They have the authority to inspect your building at any reasonable time (FPPA Sec. 28).




Building Department


Involved in new construction, renovations, and occupancy permits. Enforces the Ontario *Building* Code.



Other Bodies


Can include TSSA (boilers, elevators) or the Ministry of Labour, depending on the situation and jurisdiction.



79 

79

Case Study: The Bad Visit
What Went Wrong?

80 

80


Case Study: The Inspector's Findings

Finding 1: Fire Alarm Panel

- Active "Trouble" signal: "P2-L3 Ground Fault".
- Operator stated "it's been like that for a week."
- No documentation (logbook, work order) to show the issue was reported or being fixed.
- Violation:** Failure to maintain the fire alarm system.

Finding 2: Fire Separations

- Inspector finds unsealed data cables (4-inch hole) going through the *rated firewall* in IT Room 101.
- No firestopping (caulking/pillows) in place.
- Violation:** Failure to maintain a fire separation.

81 

81

Case Study: The Final Straw

Finding 3: Smoke Detector

Inspector reviews the logbook and finds the last "Annual Test" report from ABC Fire Co. The report lists a deficiency: "Suite 201 Smoke Detector - No Access."

This deficiency *invalidates the entire system's certification.*

There is no follow-up work order showing this was ever corrected, re-tested, and verified.

Violation: Failure to complete annual testing.

82



82

From Violation to Compliance: The Fix

1. Receive the Order: Be professional. Sign for the document. Ask the inspector to clarify any points and confirm the "compliance deadline".
2. Create Work Orders: Immediately create *separate, trackable* work orders for each deficiency. Reference the Inspection Order # on each WO.
3. Perform the Fix:
 - Alarm Panel: Service vendor is called to repair the ground fault.
 - Firestop: A *certified* contractor is hired to seal the penetration per *ULC-S115* standards.
 - Detector: Coordinate access to Suite 201, have vendor test and replace detector.
4. Document & Respond: Prepare a formal response letter to the AHJ with *copies of the "Closed" work orders* as proof of compliance.

83



83

The "Perfect" Work Order: Your Proof



REFERENCE

Inspection Order IO-2025-101, Item 3.



ISSUE

Per annual report, Suite 201 smoke detector not tested (no access).



ACTION TAKEN

Scheduled access with tenant. Replaced faulty detector head (Model X). - J. Smith, ABC Fire Co.



RE-TEST & VERIFICATION

Post-repair, tested new detector. Confirmed alarm signal at panel. System clear. - J. Smith, ABC Fire.

84



84


The Legal Stick: Notices, Orders & Fines


Notice of Violation (NOV)

- This is a *formal warning*.
- Lists non-compliance issues found during an inspection.
- Gives a (often short) timeline to comply.
- Failure to comply can lead to an Inspection Order and/or fines.

Inspection Order (FPPA Sec. 19)


- This is a *legal order*.
- Issued for more serious, immediate-risk issues.
- Sets a firm, legally-binding deadline for compliance.
- Failure to comply is an offence under the FPPA (Sec. 33) and *will* lead to fines.



85 

85

How to Prepare for Audits
What Went The Proactive Guide?

86 


86

1. Be Your Own Inspector

Walk the Site Weekly

Look for the 'easy wins' an inspector will spot in 30 seconds:

- Are fire doors wedged open? Do they *positively latch*?
- Are extinguishers blocked or expired?
- Are exit signs lit? Is emergency lighting functional?
- Is the fire panel 'Normal'?
- Are service rooms clear of combustible storage?

87 

87

2. Audit Your Own Paperwork

- **Gather All Documents:** Pull all ITM reports for the last 2 years (Alarm, Sprinkler, Extinguisher, etc.).
- **Read Every Page:** Don't just file it. Read the "Deficiencies" or "Recommendations" section.
- 🔍 **Find the "Closing" Document:** For *every* deficiency listed, find the matching "Closed" work order that proves it was fixed.
- 📝 **Create a Deficiency Log:** If you can't find the fix, you have a *critical gap*. Fix it now.

88



88

3. Get a "Friendly" Due Diligence Audit



Hire a Third-Party Auditor

An independent fire consultant can:

- Perform a "mock-AHJ" inspection and logbook review.
- Identify gaps in your *process* and documentation that you might miss.
- Provide an unbiased, expert report, giving you a clear action plan *before* the real inspector arrives.

89



89


Unit 7 Continuous Improvement



90


Unit 7 Objectives

- ✓ Define Continuous Improvement (CI) in fire safety.
- ✓ Understand the "Plan Do Check Act" (PDCA) model.
- ✓ Identify key programs to establish a CI cycle.
- ✓ Shift from a *reactive* to a *proactive* safety culture.

91 


91

What is Continuous Improvement?




It's Not "One & Done"

Compliance isn't a single event. It's an ongoing process of finding and fixing gaps.




It's Proactive

It's the shift from "fixing violations" to "preventing violations from happening."




It's a Culture

It involves everyone, from senior management to on-site staff, in the safety process.

92 


92

The Engine of CI: Plan Do Check Act




PLAN

Identify a goal or problem. Analyze data. Plan a change.




DO

Execute the plan on a small scale. Implement the change.




CHECK

Measure the results. Did the change work? What was learned?



ACT / ADJUST





If successful, standardize it. If not, adjust the plan and begin again.

93 

93

PLAN: Finding the Gaps

You can't fix a problem you don't know you have. Planning starts with data.

-  **Review AHJ Orders:** What are your common violations?
-  **Review Contractor Reports:** What deficiencies are found *every* year?
-  **Analyze Internal Audits:** What are your own staff finding?
-  **Set a Goal:** "Our goal is to reduce 'no access' deficiencies by 50% in 6 months."

94



94

DO: Implementing the Change

This is the Action Phase:

Based on our "no access" goal, the "Do" phase is:

- Develop a new tenant notification procedure.
- Train building operators on the new procedure.
- Hold a toolbox talk with staff on the importance of 100% access for testing.
- Execute the new procedure on the next scheduled test.

95



95

CHECK: Measuring Success

Did it Work?

The "Check" phase is about honest, data-driven review.



- Review the *new* fire alarm report.
- Compare to the *old* report.
- Did "no access" deficiencies decrease?
- Get feedback from staff: Was the new procedure easy to follow?

96




96

ACT / ADJUST: Closing the Loop


- **ACT (If it Worked):** The new procedure is a success. Standardize it. It is now the *new* official SOP for all properties. Update the training manual.
- **ADJUST (If it Failed):** We still had 10 "no access" issues. *Why?*

 - > Feedback: "The notification letters were confusing"
 - > **New Plan:** Re-write the letter and try again.

97 

97

Key CI Programs
Making the Cycle a Habit

98 

98


Program 1: Internal Audit Program

Logbook Audits

- Quarterly, have a manager or third-party audit your logbooks.
- Check for missed tests, open deficiencies, or incomplete entries.
- This is your "CHECK" phase done *for* you.

Site Walkthroughs

- Monthly, have a manager walk the site with the "sole purpose" of finding fire code issues.
- Use a checklist.
- This is your "PLAN" phase: finding new problems to solve.

99 

99

Program 2: Deficiency Tracking Program

“Open Loop” vs. “Closed Loop”

- An “Open Loop” is a deficiency without proof of correction. This is your biggest legal risk.
- A “Closed Loop” is a deficiency report + a “Closed” work order.
- This program *proves* Due Diligence.

The Deficiency Log

- Create a central spreadsheet or software log.
- List EVERY deficiency from EVERY report.
- Assign a status (Open / Closed) and link the “Closed” WO.
- This log becomes your #1 tool for CI.

100

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Program 3: Staff Training & Engagement

Training is a “Do” activity:

Your staff are your eyes and ears. Use them.

- **Toolbox Talks:** 5-minute talks on single topics. “Reporting blocked exits,” “Spotting panel troubles.”
- **“What If” Scenarios:** Go beyond drills. “What if this stairwell is full of smoke? What is your alternate path?”
- **Feedback Sessions:** Ask staff for their ideas. “What’s the biggest fire risk you see?”

101

101

Summary: The Safety Journey

1. COMPLIANCE

Meeting the minimum OFC requirements. (Reactive)

2. DUE DILIGENCE

Proving you did everything reasonable. (Defensive)


3. CONTINUOUS IMPROVEMENT

A data-driven cycle to get better. (Proactive)

102

102


Unit 8
Capstone Exercise



103

Capstone Objectives

- ✓ Apply knowledge from Units 1-7 to a complex, real-world scenario.
- ✓ Test decision-making in a high-pressure (but simulated!) situation.
- ✓ Connect the dots between FSPs, OFC, Documentation, and Due Diligence.
- ✓ Practice the *entire* compliance loop: from incident to improvement.

104 


104

The Scenario: Part 1 - The Incident

It's 10:00 AM. A tenant renovation contractor is welding on P1. You *have* their Hot Work Permit on file.

Suddenly, a different contractor driving a lift shears a sprinkler head in an adjacent area. Water is now flowing, and the fire alarm is in full ALARM.

The panel is ringing, the monitoring station is calling, and the Fire Department is en route.

105 

105

The Challenge: Question 1 (Units 1, 2, 4)

You meet the Fire Dept, confirm it's a false alarm, and they leave. You **MUST** shut down the sprinkler zone to stop the water.

What are the 5 key steps of your Fire Impairment Program?

- ? 1. Who do you notify (and in what order)?
- ? 2. What is your legal duty while the system is down?
- ? 3. What *other* high-risk activity must be stopped?
- ? 4. How do you log this event?
- ? 5. What do you do when the system is fixed?

106



106

Answer 1: The Impairment Protocol

- Notify Stakeholders:** Call Monitoring Co. & Fire Dept. (non-emergency) *before* shutdown. Notify tenants.
- Implement Fire Watch:** Legally required by OFC. Patrols of the impaired area. (Unit 2)
- Stop All Hot Work:** Your Hot Work Program is invalid while sprinklers are down. Stop the welders. (Unit 4)
- Log Everything:** Start an impairment log. Time of shutdown, notifications, Fire Watch start. (Unit 3)
- Restore & Report:** Once fixed, notify FD & Monitoring Co. that the system is back online. Log it. (Unit4)

107



107

The Challenge: Question 2 (Units 3, 5, 6)

The immediate crisis is over, but your legal and financial liability has just begun. The contractor who hit the pipe is blaming the welder for "not having a spotter."




What 3 documents MUST you have on file by end-of-day to prove Due Diligence and protect the owner?


108



108

Answer 2: Building Your Legal File

 <p>1. The Incident Report A formal log of "what, where, when, who." Include all notifications, actions, and observations. (Unit 3)</p>	 <p>2. The "Closed" WO The "fix" from your vendor, stating the head was replaced, system tested, and restored. (Unit 3 & 6)</p>	 <p>3. The Hot Work Permit Proves you followed your SOP *before* the incident. This shifts liability to the contractors. (Unit 4 & 5)</p>
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109 


109

The Challenge: Question 3 (Units 7)

The system is fixed. You're fully compliant. The incident is *closed*... but it's not ***finished***

Using the PDCA model, how do you prevent this from happening again?


What is your "Act/Adjust" step?

110 

110

Answer 3: The PDCA Debrief (CI)

<p>PLAN / CHECK (Analyze)</p> <ul style="list-style-type: none"> Root Cause: The root cause was *not* the broken pipe. It was a *lack of contractor coordination.* Check: Review all contractor procedures. Why was a lift driving near a welder's "hot zone"? 	<p>ACT / ADJUST (Improve)</p> <ul style="list-style-type: none"> New SOP: "SOP-FS-018: Contractor Coordination." New Rule: "All Hot Work zones must be physically barricaded (tape is not enough). No other trades may enter." New Training: Add this to your contractor check-in package.
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111 

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The Challenge: Bonus Round (Units 5, 6)

An hour later, a Fire Inspector arrives for a *random, unrelated* inspection. She sees your Fire Watch patrolling and asks, "What's going on?"

This is a test of your professionalism and due diligence.

How do you handle this?

What single document will satisfy her?

112



112

Answer 4: Professionalism & Transparency

Be Honest & Confident: "Inspector, we had an accidental impairment at 10:00 AM. We are following our approved impairment procedure." (Unit 6)

Show The Log: The *one* document is your **Impairment Log**.

Prove Due Diligence: The log shows you notified the FD, Monitoring Co., and started a Fire Watch. You have *proven* you are in control.

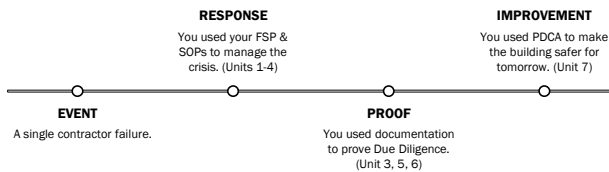
The Result: The inspector sees you are competent and following the law. This turns a *potential violation* into a *demonstration of professionalism*. (Unit 5)

113



113

Capstone Summary: You are a Leader



114



114

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115

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