

NATIONAL INTERAGENCY FIRE CENTER

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9216 NFES (LLFA240000)

February 28, 2012



NATIONAL FIRE EQUIPMENT SYSTEM CACHE MEMORANDUM NO. 12-1

To: NFES: National Interagency Support Caches

From: Leslie Anderson, Chair, Equipment Technology Committee (ETC) – NWCG

Subject: Labeling Requirement for High Pressure Pumps, NFES 0148 and 0601



EPA emission regulations under Title 40 required compliance of small non-road engines in 2010. However, there are provisions for the exemption of certain new small engines. The Mark III and the Wick 375 – high pressure pumps – fall under this exemption as no EPA-compliant pump exists with the same required performance and design constraints. As required by CFR 40 Part 1054.660, manufacturers of new high pressure pumps must take the following steps to ensure the exemption of the pumps:



- Determine annually that no engines certified to current emission standards are available to power the equipment safely and practically.
- Notify the EPA Designated Compliance Officer of the intent to use the provisions of CFR 40 Part 1054.660 to exempt the high pressure pumps from the emission standards in CFR 40.
- Permanently label engines with the following statement:

“EMERGENCY RESCUE EQUIPMENT—EXEMPT FROM EMISSION STANDARDS UNDER 40 CFR 1054.660.”



For high pressure pumps that are currently in the field and cache system, there is no legal requirement for exemption labeling. However, in order to promote consistency in the inventory and encourage communication of EPA requirements, all high pressure pumps in the national cache system should be retrofitted with permanent labels with the exemption statement when there is an opportunity to do so. Use the dimensions in Figure 1 to create or purchase labels and attach the labels to the engine exterior. Figure 2 shows an example of a new Wick 375 with a manufacturer applied label on the engine.



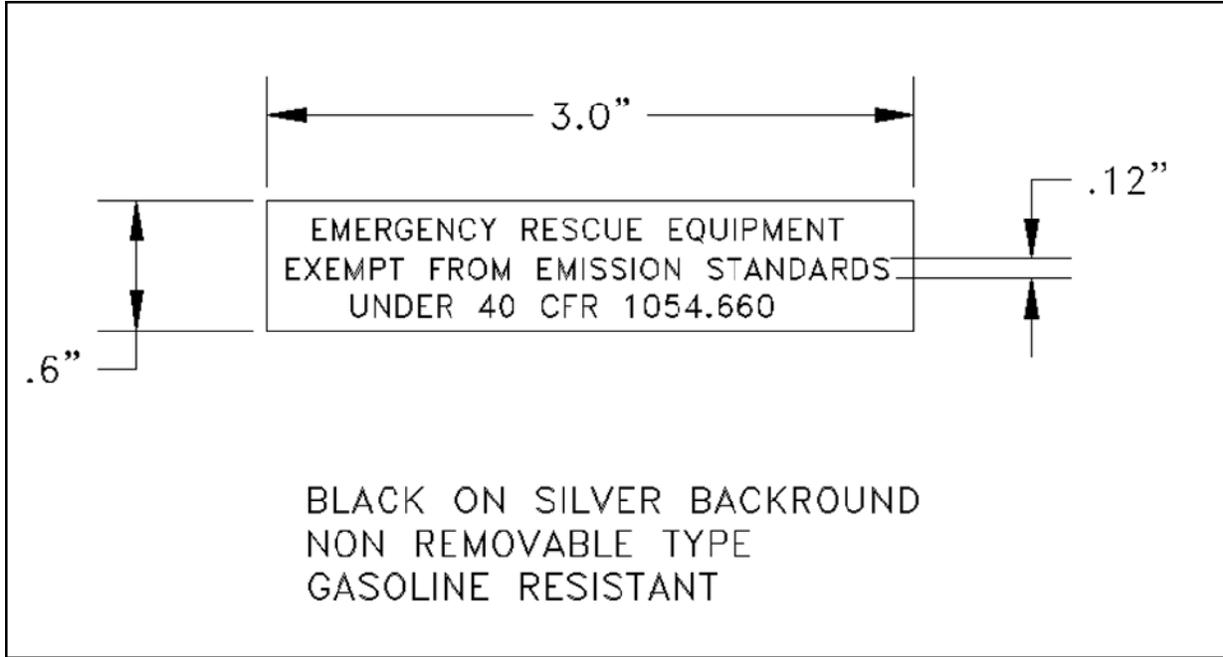


Figure 1

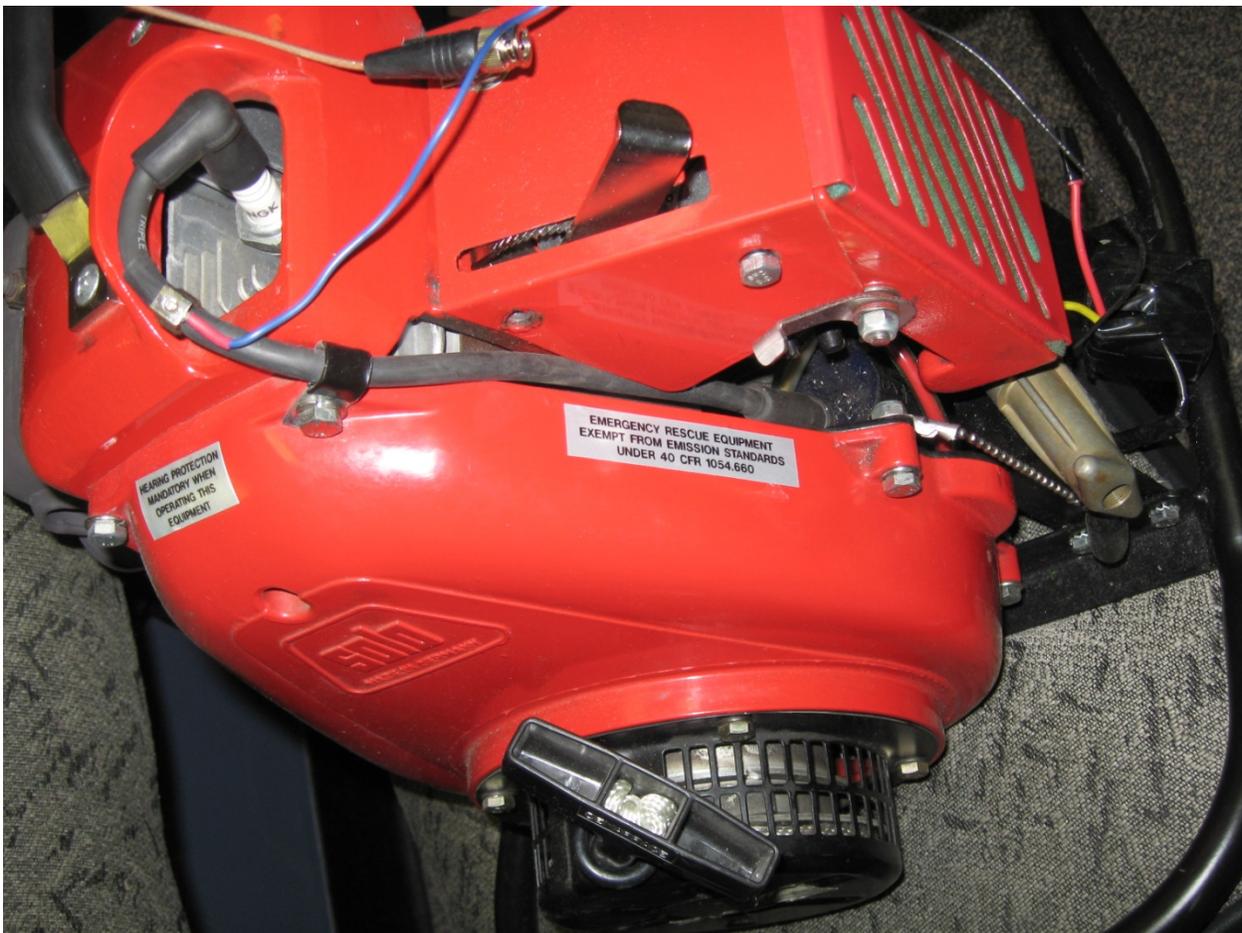


Figure 2

The EPA exemption clause should be printed directly (thermal transfer) on the label substrate material. An over-laminate material is required as well to prevent deterioration from petrochemical spillage or severe handling conditions.

Potential sources for labels:

3M – Can be purchased as a complete label

Substrate: 3M Thermal Transfer Polyester Label Material 7818, Matte Silver

Over-laminate: 3M Polyester Over-laminating Film 7731FL, 2 mil

Contact info: David Fabris

GM Nameplate

408-944-3826

Gerber Scientific Products – Material only; no printing service

Substrate: Gerber Label Stock – 1 mil, Brushed Silver, MH25192

Over-laminate: GerberGuard, 3 mil

Contact info: Anne-Marie Piggott

800-222-7446

For questions or comments on EPA requirements for the exemption of high pressure pumps, from emission standards contact Sam Wu at SDTDC at (909) 599-1267 extension 292 or by email at swu@fs.fed.us.

/s/ Leslie Anderson

cc:

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