Pre-Load Test Evaluation Report - [redacted]

Pre-Load Test Evaluation by Fire Escape Engineers

is an approved member of Fire Escape Services Network

Contact: 800-649-3333 or info@FireEscapeEngineers.com

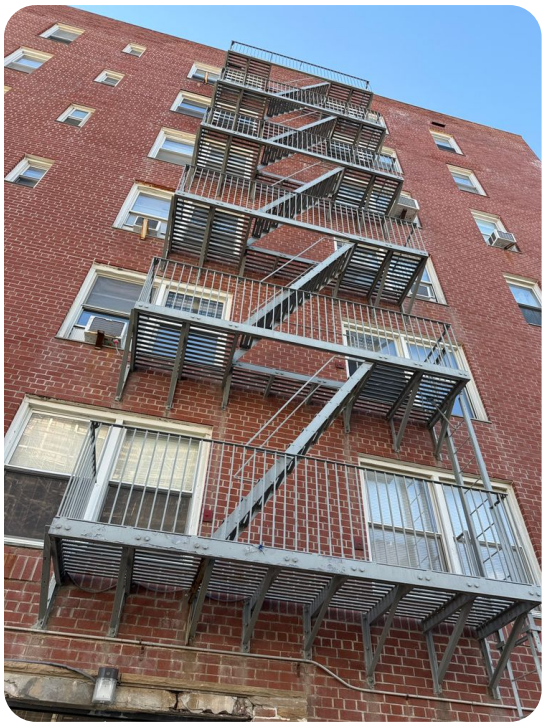
Address: [redacted]

Inspector: FranCisco Meneses

Evaluation Date: 10/22/2025

Building Description: **7**-story **brick** structure with **4** systems on the building.

Systems Overview:

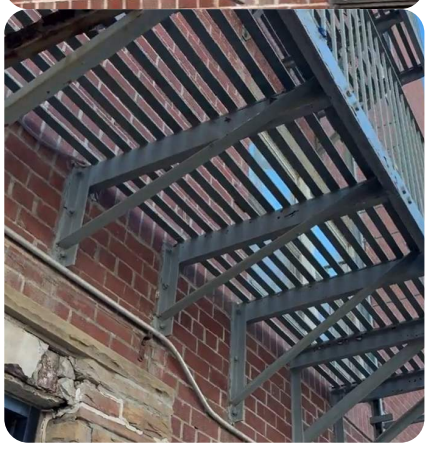
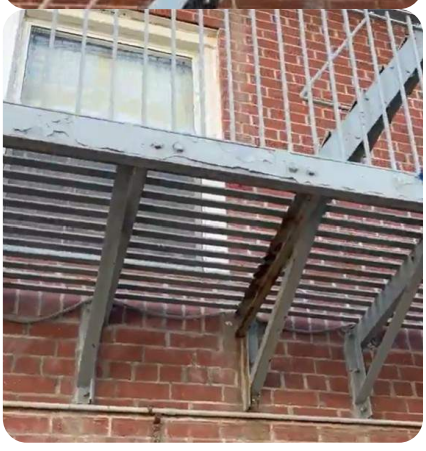


System A: Pass Pending Load Test (PPLT)

- **Type:** Painted Steel
- The system consists of **platforms**, **stairs**, and **drop ladder** to grade.





Components Overview:

1. Structural Summary

Supports / Cement:
Additional brackets ("kickers") have been installed, they are PENC. Original support brackets appear to be embedded 8–12 inches into the structure, which is sufficient ready for load test.

Rails:
New railings are present and appear to meet code, with vertical pickets spaced at four inches on center and a height of approximately 42 inches, ready for load test.

Treads:
Tread clips appear intact with no observed deformation, staining, or separation, ready for load test.

Drop Ladder:
Presumed fair and functional

2. Paint Summary

Overall, the paint **Pass: Spot paint** on system recommended. Recommend to power wash and seal all major joints to prevent water intrusion into structural connections.

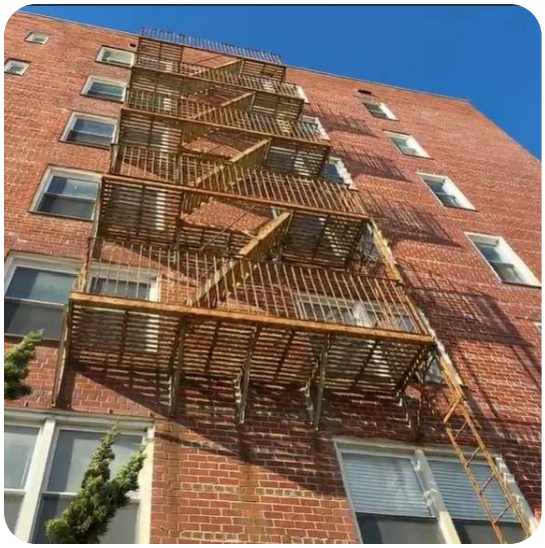
Fire Escapes must be maintained/painted every 5–7 years as per manufacturer's recommendation.

3. Code Summary

Our inspector found some code issues related to AHJ (Authority Having Jurisdiction) or PENC (pre-existing non-conforming) requirements for this Fire Escape system:

1. No Egress Lighting
2. PENC, midline rails missing in the handrails and stair pits.

Code	Pass / Fail
IFC 1104.16.7 Maintenance. (PAINT REQUIRED)	**Paint - Pass/Fail** • **Spot** paint recommended.
IFC 1104.16.5.1 Examination. **IFC 1104.16.5 Materials and strength.** **(LOAD TESTING, OTHER EVIDENCE**	**Structural** - Pass Pending Load Test (**PPLT)** • Fair and functional, ready for load testing.
IFC 1008.2 Illumination required. **(CODE)**	**Code - Fail:** • No Egress Lighting • Missing midline rails for handrails and stair pits, PENC.
NFPA Life Safety Code 101 7.2.8.6.2	AHJ shall approve certification by Load Test or Other Evidence of Strength
January 2010 Standard Specification: Miscellaneous & Ornamental Metals — Fire Escapes (Section 5A.10, Paragraph E)	**NO FIELD WELDING is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted).**



System B1: Pass Pending Load Test (PPLT)

- **Type:** Painted Steel
- The system consists of **platforms**, **stairs**, and **drop ladder** to grade.

Components Overview:

1. Structural Summary

Supports / Cement:
Additional brackets ("kickers") have been installed, they are PENC and need paint. General surface corrosion was observed, but reinforcement of brackets appears adequate for load testing. No structural failure or anchorage concerns.

Grating / Platforms:
Platform slats appear in good condition with no noted displacement or damage. Ready for load testing.

Rails:
Railings are welded and directly seated onto C-channels. This configuration traps water and promotes rusting. Rails should be lifted by at least one inch, reinstalled and sealed to prevent long-term corrosion. Welded corners may require re-bolting for load compliance.

Treads:
Corrosion observed in treads, treads appear structurally sound from initial observation, but further evaluation and hammer testing are required.

Stringers:
Stringer clips appear intact with no visible signs of cracking or displacement. The bottom termination is a notch into the C-channel without mechanical bolting, but no deficiency noted from visual inspection. ready for load testing.

Other:
Significant rust-jacking observed between rails and C-channels. Remediation will be necessary as part of post-load test repairs. Ground-level inspection suggests overall readiness for testing, pending further evaluation to ensure a full assessment of the systems' current condition.

2. Paint Summary

Overall the paint **Fail: Full paint** on system required before/after repairs. Recommend to power wash and seal all major joints to prevent water intrusion into structural connections.

Fire Escapes must be maintained/painted every 5–7 years as per manufacturer's recommendation.

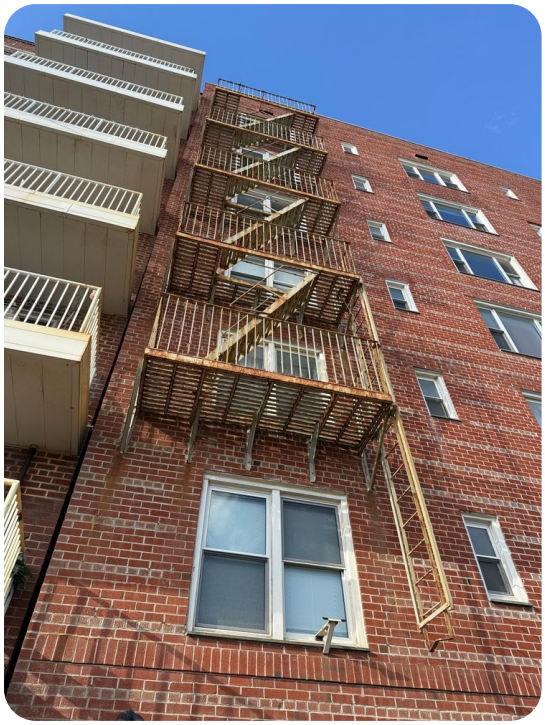
3. Code Summary

Our inspector found some code issues related to AHJ (Authority Having Jurisdiction) or PENC (pre-existing non-conforming) requirements for this Fire Escape system:

1. No Egress Lighting
2. PENC, midline rails missing in the handrails and stair pits.

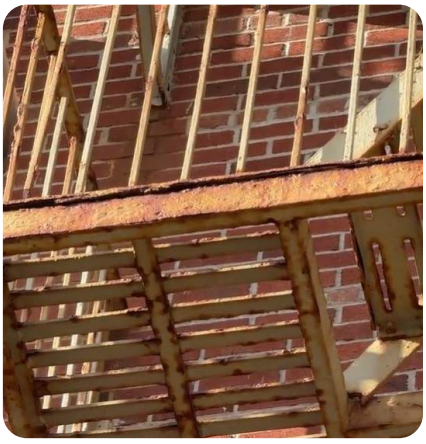
Code	Pass / Fail
IFC 1104.16.7 Maintenance. (PAINT REQUIRED)	**Paint - Fail** • **Full** paint required.
IFC 1104.16.5.1 Examination. **IFC 1104.16.5 Materials and strength.** **(LOAD TESTING, OTHER EVIDENCE**	**Structural** - Pass Pending Load Test (**PPLT)** • Suspect connections, treads, platform frame and widespread external corrosion on the entire system, will require further evaluation and load testing.
IFC 1008.2 Illumination required. **(CODE)**	**Code - Fail:** • No Egress Lighting • Missing midline rails for handrails and stair pits, PENC.

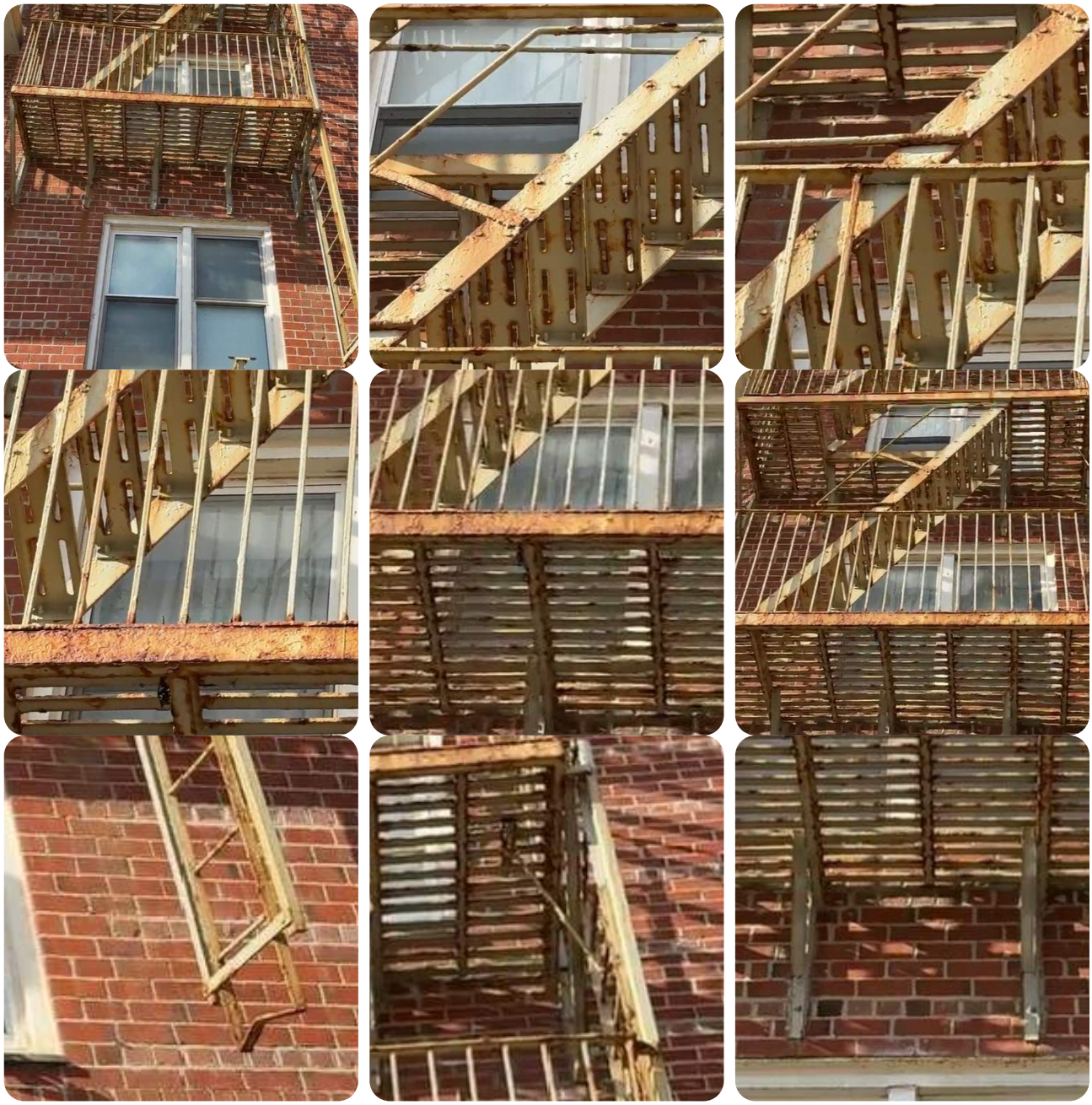
NFPA Life Safety Code 101 7.2.8.6.2	AHJ shall approve certification by Load Test or Other Evidence of Strength
January 2010 Standard Specification: Miscellaneous & Ornamental Metals — Fire Escapes (Section 5A.10, Paragraph E)	**NO FIELD WELDING is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted).**



System B2: Pass Pending Load Test (PPLT)

- **Type:** Painted Steel
- The system consists of **platforms**, **stairs**, and **drop ladder** to grade.





Components Overview:

1. Structural Summary

Supports / Cement:
Additional brackets ("kickers") have been installed, they are PENC and need paint. General surface corrosion was observed, but reinforcement of brackets appears adequate for load testing. No structural failure or anchorage concerns.

Grating / Platforms:
No visible deficiencies noted from the ground-level inspection, will need paint.

Rails:
Rails are welded directly to the C-channel, which allow for moisture entrapment leading to future corrosion. Although they may pass lateral load testing, their direct contact with horizontal surfaces requires correction. Rails should be elevated to allow for proper drainage and to prevent long-term corrosion.

Treads:
Corrosion observed in treads, tread condition suggests a 25%–50% surface failure rate. Structural integrity will require further evaluation and load testing.

Drop Ladder:
Ladder is bent at the bottom likely from its drop release. No major deficiencies, presumed to be functional.

Other:
Rust has been identified in various locations, particularly at connections and rail junctions. Corrosion is not yet severe but needs addressing to prevent further degradation. Overall system requires further evaluation to assess the full scope of the systems current condition and load testing to confirm its structural integrity.

2. Paint Summary

Overall the paint **Fail: Full paint** on system required before/after repairs. Recommend to power wash and seal all major joints to prevent water intrusion into structural connections.

Fire Escapes must be maintained/painted every 5–7 years as per manufacturer's recommendation.

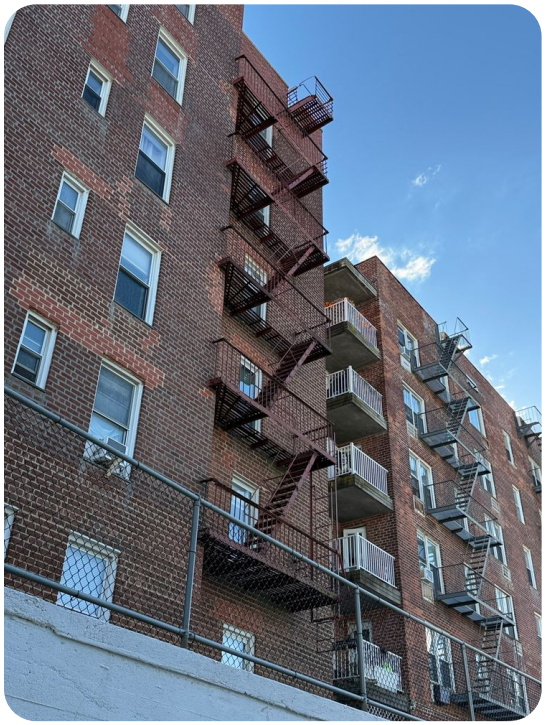
3. Code Summary

Our inspector found some code issues related to AHJ (Authority Having Jurisdiction) or PENC (pre-existing non-conforming) requirements for this Fire Escape system:

1. No Egress Lighting
2. PENC, midline rails missing in the handrails and stair pits.

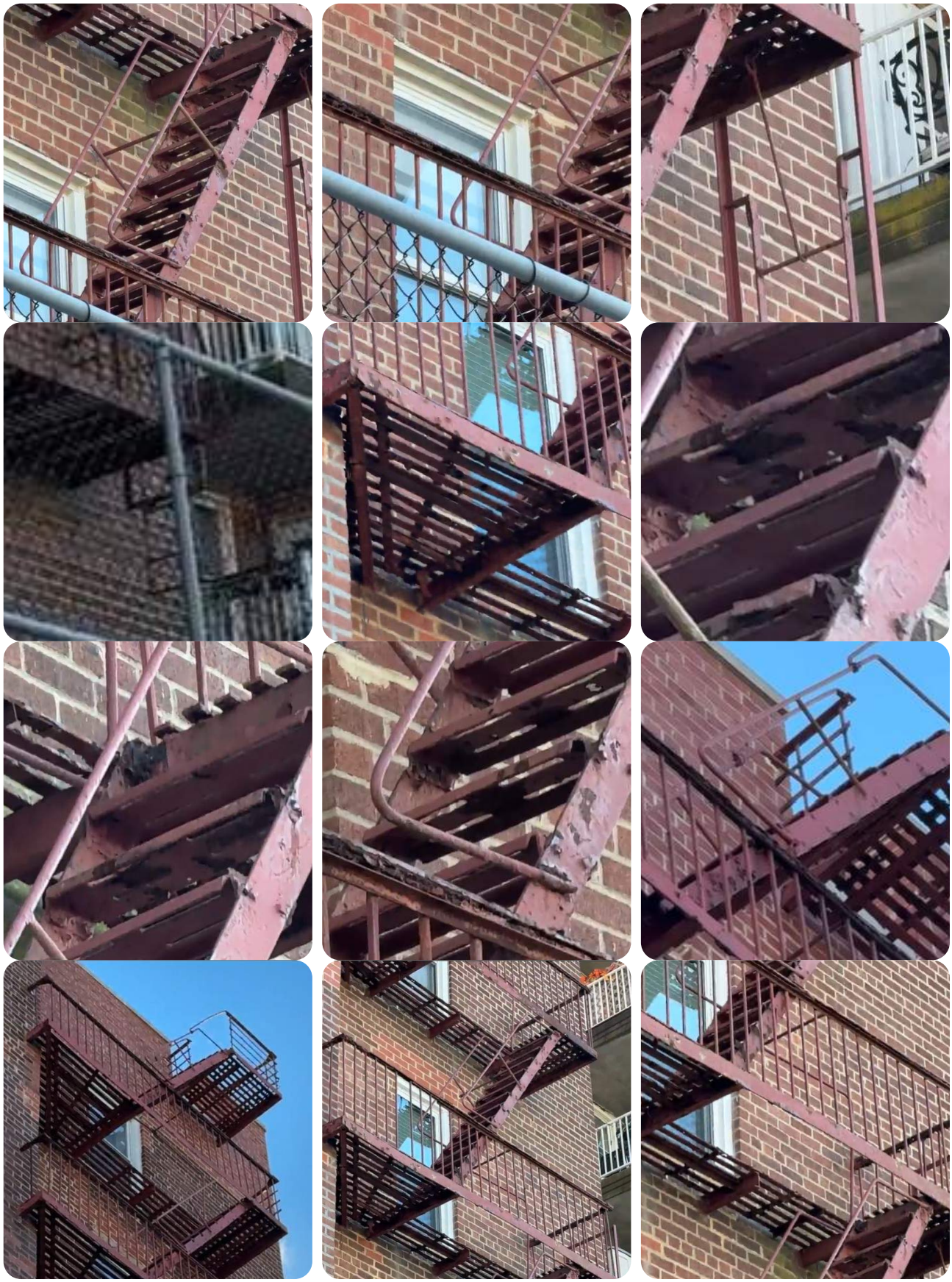
Code	Pass / Fail
IFC 1104.16.7 Maintenance. (PAINT REQUIRED)	**Paint** - **Fail** • **Full** paint required.
IFC 1104.16.5.1 Examination.	**Structural** - Pass Pending Load Test (**PPLT)** • Suspect connections, treads, platform frame

IFC 1104.16.5 Materials and strength. (LOAD TESTING, OTHER EVIDENCE	and widespread external corrosion on the entire system, will require further evaluation and load testing.
IFC 1008.2 Illumination required. (CODE)	**Code - Fail:** • No Egress Lighting • Missing midline rails for handrails and stair pits, PENC.
NFPA Life Safety Code 101 7.2.8.6.2	AHJ shall approve certification by Load Test or Other Evidence of Strength
January 2010 Standard Specification: Miscellaneous & Ornamental Metals — Fire Escapes (Section 5A.10, Paragraph E)	**NO FIELD WELDING is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted).**



System D: Pass Pending Load Test (PPLT)

- **Type:** Painted Steel
- The system consists of **platforms**, **stairs**, and **drop ladder** to grade.



Components Overview:

1. Structural Summary

Supports / Cement:
Cement connections and wall interfaces appear visually sound from the ground level, with no major cracks or signs of displacement observed up to the roof level. Ready for load testing.

Treads:
Rust jacking is present on corners, indicating moisture intrusion and potential deterioration at tread-to-stringer connections. Based on typical patterns, additional corrosion in treads is likely. These conditions warrant further evaluation during physical walkthrough and load testing.

Rails:
Presence of rust jacking near connections suggests that some rail components may require remediation after testing.

Other:
Rust jacking observed at multiple corner locations indicates hidden corrosion at critical joints. A deficiency report will follow load testing to identify and repair affected areas.

2. Paint Summary

Overall the paint **Fail: Full paint** on system required before/after repairs. Recommend to power wash and seal all major joints to prevent water intrusion into structural connections.

Fire Escapes must be maintained/painted every 5–7 years as per manufacturer's recommendation.

3. Code Summary

Our inspector found some code issues related to AHJ (Authority Having Jurisdiction) or PENC (pre-existing non-conforming) requirements for this Fire Escape system:

1. No Egress Lighting
2. PENC, midline rails missing in the handrails and stair pits.

Code	Pass / Fail
IFC 1104.16.7 Maintenance. (PAINT REQUIRED)	**Paint - Fail** • **Full** paint required.

IFC 1104.16.5.1 Examination. **IFC 1104.16.5 Materials and strength.** **(LOAD TESTING, OTHER EVIDENCE**	**Structural** - Pass Pending Load Test (**PPLT)** • Suspect rusted connections, treads, and widespread external corrosion on the entire system, will require further evaluation and load testing.
IFC 1008.2 Illumination required. **(CODE)**	**Code - Fail:** • No Egress Lighting • Missing midline rails for handrails and stair pits, PENC.
NFPA Life Safety Code 101 7.2.8.6.2	AHJ shall approve certification by Load Test or Other Evidence of Strength
January 2010 Standard Specification: Miscellaneous & Ornamental Metals — Fire Escapes (Section 5A.10, Paragraph E)	**NO FIELD WELDING is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted).**

Applicable Codes

IFC 1104.16.5 Materials and strength.

Components of fire escape stairways shall be constructed of noncombustible materials. Fire escape stairways and balconies shall support the dead load plus a live load of not less than 100 pounds per square foot (4.78 kN/m^2). Fire escape stairways and balconies shall be provided with a top and intermediate handrail on each side.

IFC 1104.16.5.1 Examination.

Fire escape stairways and balconies shall be examined for structural adequacy and safety in accordance with Section 1104.16.5 **by a registered design professional or others acceptable to the fire code official** every 5 years, or as required by the fire code official. An inspection report shall be submitted to the fire code official after such examination.

IFC 1104.16.7 Maintenance.

Fire escape stairways shall be kept clear and unobstructed at all times and shall be maintained in good working order.

IFC 1008.2 Illumination required.

The means of egress serving a room or space shall be illuminated at all times that the room

or space is occupied.

NFPA Life Safety Code 101 7.2.8.6.2

The Authority Having Jurisdiction (AHJ) shall approve any fire escape by Load Test or Certification (other evidence of strength).

Pre-Load Test Evaluation - Explained

IFC 1104.16.5.1 Examination: *Fire escape* stairways and balconies shall be examined..... **An inspection report shall be submitted to the *fire code official* after such examination.**

Thank you for allowing us to perform an initial evaluation of your fire escape system. At this stage, our assessment was conducted either entirely from the ground or during a brief, complimentary visual walk through. In such cases, our inspection is *limited in scope* and relies heavily on binoculars, zoom lenses, and visual clues from accessible vantage points.

Because most structural issues—especially corrosion—occur at the *top of connections* or behind face-mounted hardware, ground-level evaluations often cannot confirm the condition of these critical areas. **This type of assessment is classified as a "Pre-Load Test Evaluation,"** which means it's designed to identify potential issues, but not to determine precise quantities, exact locations, or whether specific components can be certified for a load test at this time.

When we do gain physical access—either by ladder, stair, or platform—we can supplement our visual findings with a short video walkthrough (typically 5–10 minutes) that includes finger-pointed commentary highlighting which elements appear ready for load testing and which require further investigation or immediate repair. Still, even these faster, free-access walk-throughs remain preliminary in nature and do not substitute for a **full, paid evaluation** where every connection is systematically examined, documented, and photographed from all angles.

If you would like a more complete report suitable for vendor pricing, budgeting, or certification purposes, one of the following will be required:

1. **Hire Our Team for a Full Evaluation** – This includes time on the system, detailed photography, mapping, and formal reporting.
2. **Use One of Our Network Repair Vendors** – We'll contact our list of qualified vendors who can physically access the system and relay critical information back to us for final review and report completion.
3. **Coordinate Access with Your Own Trusted Repair Mechanic** – They must be capable

of documenting on-system conditions so we can issue a load test certification, repair scope, or engineering findings.

We appreciate the opportunity to support your compliance journey and will guide you through the next steps needed to bring your fire escape system into full certification.

Conclusion & Next Steps

Please let us know whether you intend to proceed as a **Do-It-Yourself (DIY)** client or if you would like to engage our team under the **Vendor Management Oversight (VMO)** program. Both options require coordination with your local authority (AHJ – Authority Having Jurisdiction) and thorough documentation to ensure your fire escape system meets certification standards.

1. **Identify a Responsible Party, Design Professional or Others Acceptable to AHJ.**
2. **Create Construction Control Document / Inspection Report. To determine if permit is required or not, by the Building Department.**
3. **Verify that the Repair Vendor is Licensed and Insured to Perform Repairs / Painting.**
4. **Load Test Upon Completion of All Repair Work or Certify via Other Evidence of Strength in lieu of Load Test. Optional: Opinion Affidavit with Disclaimer of Liability.**
5. **Client is Responsible for Identifying Design Professional or Others Acceptable to AHJ Before Any Work is to be Performed other than Emergency Repairs to make Fire Escape Functional until Permanent Repairs are Scheduled.**

Option 1: DIY Path – You Manage the Process

If you plan to manage your own vendors and documentation, you are responsible for complying with all applicable **fire, building, and EPA regulations**. The following steps must be followed:

DIY Compliance Steps

1. Notify the City Official

Contact your local **Fire Marshal or Building Department** and:

- Inform them you've engaged a **design professional** (engineer, architect, or other acceptable party) to inspect and evaluate the fire escape.
- Request clarification on:

- Whether they treat missing lights as a **pre-existing, nonconforming condition**, or if full **egress illumination** is required.
- Whether **permits** are needed for restoration/repairs based on the findings.
- Whether they wish to **witness the inspection**.

2. Inspection & Documentation

- Hire a **licensed engineer, architect, or other AHJ-approved fire escape inspector**.
- Vendors must conduct a **full-system walkthrough**, accessing every platform, tread, and connection.
- All deficiencies must be **documented** and a **repair scope** submitted to the owner and AHJ.

3. Scope Review & Permitting

- A **design professional** must review the repair scope and determine whether permits are required by the AHJ.

4. Designate a Responsible Party

- Notify the city who will **supervise the repair process**, ensuring work is performed in accordance with the approved scope (with or without permits).

5. Repair Restrictions (Lead Paint & EPA Compliance)

- **Welding is strictly prohibited** on fire escapes built before 1978.
- **No field welding** is permitted under any circumstances.
- Repairs must be **bolted** or **shop welded and field-bolted**.
- Violations may result in **EPA fines exceeding $37,500**.

Option 2: VMO Path – We Manage the Process for You

If you prefer a fully managed solution, our **Vendor Management Oversight (VMO)** program provides professional oversight, technical guidance, and final certification support.

What's Included in VMO:

- **Initial Evaluation Report & Photo-Video-Technical Repair Report**
  - One-page summary indicating **Pass**, **Fail**, or **Imminent Danger**
  - Includes ground or physical findings, photos, and optional video

- **AHJ Communication & Coordination**
  - We notify the city and clarify inspection witness needs, lighting requirements, and permit conditions
- **Daily Vendor Oversight**
  - We review daily photos/videos from your vendor
  - Ensure repairs follow approved methods and meet IFC and IBC codes
  - Prevents illegal welding; ensures proper bolting and documentation
- **Inspection Video Summary**
  - Narrated walkthrough highlighting deficiencies and identifying components ready for load testing
- **Final Report & Certification**
  - 25-point confidence checklist with repair recommendations/requirements
  - Photographs and final walkthrough video by our inspector
  - Certification issued via **Load Test** or **Other Evidence of Strength**
- **Password-Protected Webpage**
  - Central hub for documentation such as: inspection report, inspection video(s), inspection photos
  - Easily shareable with AHJ, owner, property managers, and agents

Request for Proposal (RFP) Options. (Fees to be paid by owner/agent or vendor)

Following this initial inspection, the property owner has the option to either proceed as a **Do-It-Yourself (DIY) client**—managing their own outreach to local vendors—or enroll in our **Vendor Management Oversight (VMO)** or **Project Management Oversight (PMO)** programs, where we coordinate the process on your behalf. Regardless of your selection, all projects remain eligible for RFP distribution.

- **For DIY clients**, it's your responsibility to invite vendors to the property and provide access so they can walk through the fire escape system and prepare their own scope and quote. (We can provide additional information to your repair vendor at additional cost.)

  - **Most vendors only provide 1 year warranty on work performed.**
- **For clients utilizing our VMO/PMO service**, we simplify this process by issuing a detailed RFP package to our pre-screened vendor network. These vendors review our inspection photos, summary findings, and any available site data—allowing them to submit accurate preliminary bids **without needing to visit the site**, unless shortlisted. This minimizes disruptions and ensures that only cost-aligned, code-qualified bids move forward.
  - **We provide a 15-25 year warranty on all work performed.**
  - **25 year warranty provided with Corrosion Protection Plan.**
  - **Network partners / repair mechanics: 5-15 year warranties under VMO/PMO.**

Load Testing Considerations

- If recent **structural bolting** has been completed, a **partial/integrated load test** may apply.
- Otherwise, a **full load test** is required unless waived by other evidence of strength (as determined by a design professional or others acceptable to the AHJ).

Temporary Certifications (If Applicable)

- If the fire escape is scheduled for **removal or replacement within 5 years**, a **temporary 5-year certification** may be available, but **still requires load testing**

Why Load Testing Your Fire Escape Is the Smartest Choice Right Now

Load testing is the **only way to fully remove liability** from you, your insurance carrier, and the city. Here's why:
• **Opinion affidavits come with disclaimers** that cities often won't sign off on — and insurance companies won't want you to sign either, because it puts all the legal risk on them (and you).
• **Load testing is definitive**: it proves your 75–125+ year-old fire escape can handle emergency use — no guesswork, no disclaimers.
• It's **100% code-compliant**, **certified**, and good for up to 5–25 years depending on the city and scope.
• It also protects your tenants and your building's value — like testing a sprinkler system or

elevator.

Bottom line: Load testing clears your liability, satisfies the city, and keeps your insurance coverage secure.

🔥 Fire Escape Financing - Powered by Fire Escape Services Network

Need critical fire escape repairs, inspections, or certifications—but want to spread out the cost? Our **Fire Escape Financing** program offers flexible, interest-free payment plans that make safety upgrades more accessible than ever.

✔️ **What We Offer:**
• **0% Interest Financing** (3–6 months standard)
• **12-Month Interest-Free Extension** for qualifying projects over $50,000
• **No credit check required**
• Available for **inspections, repairs, drawings, load testing, and full project oversight**
• Financing is available across all **FESN brands and services**

🏡 **Who Qualifies:**
• Property owner must sign the agreement
• Project must be directly managed by FESN **or an approved vendor from our network**
• In special cases, even **client-selected vendors** can participate—if they agree to our financing terms

💡 **Extended Financing:** Need longer than 12 months?
We also offer **1–15 year financing options (with interest)** through an **affiliated third-party loan provider** for **residential properties only**.

⚠️ **Important Notes:**
• **No warranties or certifications** will be released until full payment is received
• All financing agreements include lien protections and binding arbitration clauses
• Legal homeowner signature is required to proceed

🔎 **Ready to Get Started?**
Whether you're working with our team or a vendor you trust, we can help finance your fire escape project—with transparency, flexibility, and legal protection for everyone involved.

More information available upon request.
Just ask your project coordinator or contact us directly to activate **Fire Escape Financing** today.

WELDING PROHIBITED FOR RESTORATION/REPAIRS ON FIRE ESCAPES

Fire Escape Repair & Lead-Hazard Compliance Policy

1. Structural Repair Policy: No Field Welding on Bolted or Riveted Fire Escapes

🛠️ Key Code Provision — January 2010 Standard Specification: Miscellaneous & Ornamental Metals — Fire Escapes (Section 5A.10, Paragraph E):

"NO FIELD WELDING is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted)."

• **"Field welding"** refers to any welding performed on-site, as opposed to factory or shop welding.
• **Shop welding** (completed off-site under controlled conditions) is permitted **only if original design or prefabrication allows for welding**.
• **Bolt or rivet-type fasteners** must be replaced in kind—matching original hardware type and method.

2. EPA Lead-Based Paint Compliance (Pre-1978 Structures)

Under the **EPA Renovation, Repair and Painting (RRP) Rule**, work on residential or child-occupied buildings built **before 1978** often involves lead-based paint. Welding that disturbs painted surfaces is subject to strict regulation.
• **Welding is effectively prohibited** on such components unless:
• An **EPA-certified renovator or firm** oversees the work, and
• **Lead-safe work practices** are fully implemented (containment, HEPA vacuums, disposable protective gear, etc.).
• **Violations** can result in civil penalties up to **$37,500 per violation, per day** for non-compliance with EPA RRP Rule provisions regarding lead hazard disturbance.

3. Combined Table: Welding & Lead-Hazard Prohibition

Condition	Field Welding Allowed?	EPA RRP-Compliant on Pre-1978 Structure?
Fire escape originally fastened with bolts or rivets	No — prohibited by 2010 code	No — welding disturbs lead paint
Shop welding precise fittings or new prefabricated parts	Yes — If performed off-site under control	Only if conducted under EPA certified RRP
Bolt or rivet replacement / mechanical fasteners	Yes — required repair method	Yes — with lead-safe protocols

4. Recommended Compliance Actions

1. **Confirm the era** of the structure—pre-1978 implies high likelihood of lead-based paint.
2. **Avoid any field welding** on fire escapes originally assembled with bolts or rivets.
3. **Use mechanical fastening** (bolts/rivets) and ensure replacement matches original methodology.
4. If welding is necessary for prefabricated components:
• Ensure welding is done in a **shop setting**, not on-site.
• For pre-1978 buildings, all surface-prep and welding work must follow **EPA RRP certified protocols**.
5. Engage a **licensed structural engineer** and a **certified RRP renovator or firm** before undertaking repairs.

5. Legal Reference Summary

• **"No field welding is permitted in the repair of fire escapes. All repairs must be bolted or shop welded (then field bolted)."** — Standard Specification 5A.10 (Miscellaneous & Ornamental Metals), January 2010
• **EPA RRP Rule enforcement** (1978-era structures): fines up to **$37,500/day per violation** for unauthorized disturbance of lead-based painted surfaces.

Whether you choose to manage the process independently or allow us to guide you through it, we ensure you have the tools and documentation to solicit and compare bids confidently—or, if you prefer, you can bypass the bid process entirely and engage our

certified team based on trust, warranty, and proven experience.

🚒NATIONAL FIRE ESCAPE ASSOCIATION (NFEA) 👩‍🚒 Safety & Certification Bulletin Eliminating a Century of Neglect and Liability

— Fire Escape Certification by Load Test

- Building Owners & Property Managers
- Building Departments (Authorities Having Jurisdiction)
- Fire Departments (Users of Certified Systems)
- Insurance Agents & Underwriters (Liability for Non-Certified Systems)

Introduction — The Roof You Forgot About

A fire escape is no different from a roof. Both were built under permit, both protect lives, and both were meant to be maintained. The difference is that every owner knows a roof must be replaced every 25–45 years — but most fire escapes, built between 1900 and 1950, have never been inspected or load tested in 75–125 years.

- A leaking roof costs money.
- A failed fire escape costs lives — and triggers lawsuits, denied claims, and personal financial loss.

The Code Has Always Been There

Since 1927, the **NFPA 101 Life Safety Code** has required that ***"the authority having jurisdiction shall accept by load test or other evidence of strength"*** any fire escape used for egress.

Today, that same requirement appears in:

- **IFC §1104.16.5** — Mandates load testing or other proof of strength every five years.
- **IBC §1001.3** — Governs installation and maintenance of means of egress.
- **Oregon Fire Code (based on IFC)** — The model for all 50 states, outlining clear

exceptions and visible tagging standards.

- **OSHA §1910.37** — Requires two certified means of egress during any occupied construction, renovation, or demolition.

The Oregon Model — Visible Proof of Safety

Oregon's Fire Code specifies a fire escape tagging system visible to firefighters, inspectors, and tenants:

- White Tag: Certified safe for emergency use.
- Yellow Tag: Repairs pending — use with caution.
- Red Tag: Unsafe — do not use.

These tags allow firefighters to identify safe access points instantly, while giving tenants and inspectors the ability to notify owners or city officials when certification has lapsed.

This system transforms public safety from an invisible liability into visible accountability.

Who Can Inspect or Certify

Only three types of professionals may examine and certify fire escapes:

1. A registered design professional (engineer or architect).
2. A registered architect in the state.
3. Others acceptable to the building official — typically Certified Fire Escape Inspectors trained and approved by the National Fire Escape Association (NFEA).

Repair contractors may not certify their own work — inspections and repairs must be performed by separate qualified, insured entities to prevent conflicts of interest.

Owner Liability — The Unseen Risk

If anyone — tenant, visitor, contractor, or even an intruder — is injured or killed on a non-certified fire escape, the owner is personally liable.

Examples of liability:

- A tenant steps out to smoke and the stair collapses.
- A contractor uses the platform for window repair and the bolts fail.
- A thief climbs up and falls when the tread gives way.

No five-year load test = no defense.

Courts treat uncertified fire escapes as negligence per se — a direct violation of life-safety law.

City & Fire Department Liability — Enforcement Failure

Authorities Having Jurisdiction (AHJs) now carry risk if they fail to enforce the five-year rule. While cities require certifications for elevators, sprinklers, alarms, and extinguishers, many ignore fire escapes entirely — even though they are a critical life-safety system designed for use without firefighter presence.

Firefighters are trained not to use uncertified fire escapes.

White tagging restores their confidence and protects municipalities from injury or death claims involving city employees.

Insurance Liability — A Century of Neglect

Insurance companies have insured millions of buildings for decades without once verifying that fire escapes were safe or certified. In many cases, there isn't even an engineer's affidavit on file.

This means every accident — a tenant fall, a firefighter injury, or a public fatality — becomes an automatic payout, with no legal basis to deny the claim.

The Solution — The 30-Day Insurance Letter

NFEA recommends that all insurers immediately implement the following standard notice:

"If your building has an exterior fire escape (wood or steel), you must provide certification by load test within 30 days. Coverage will continue; however, any incident involving an uncertified fire escape may be excluded from liability."

This mirrors requirements already enforced for elevators, sprinklers, and alarms, ensuring equitable standards across all life-safety systems.

OSHA & Temporary Egress Standards

Under OSHA §1910.37, every occupied structure must have two certified means of egress.

If a fire escape cannot be certified:

1. Block access and post "Do Not Use" signage.
2. Install OSHA-compliant scaffold stairs (36-inch tread width, 7/11 rise/run for occupied structures).

For unoccupied construction sites, temporary scaffolds with 24-inch treads and 8/8 rise/run may be used, with AHJ and Fire Department approval.

Confidence Testing — The National Benchmark

The NFEA 25-Point Confidence Test is the national standard for fire escape evaluation.

Adopted by Lowell (MA), Yonkers (NY), Seattle (WA), Portland (OR), and Los Angeles (CA), it assesses:

- Structural integrity,
- Paint and corrosion condition,
- Code compliance and anchorage,
- Pre-existing non-conforming conditions.

One-page "opinion affidavits" — still used in many cities — carry disclaimers ("to the best of my knowledge and belief") that have led to millions in liability claims.

Conclusion — One Load Test Ends a Century of Liability

For a century, each stakeholder assumed someone else was maintaining fire escapes.

No one was.

Now, every building owner, AHJ, and insurer has the same clear obligation:

Certify, load test, and tag every fire escape every five years.

It protects tenants, firefighters, and first responders.

It shields cities and insurers from costly lawsuits.

And it saves lives — one fire escape at a time.

A fire escape is a life-safety system, not an ornament.

Certification by load test is not optional — it's overdue.