State of Idaho
DEPARTMENT OF HEALTH AND WELFARE
Division of Medicaid

Bureau of Facility Standards

DIRK KEMPTHORNE
GOVERNOR
KARL B. KURTZ
DIRECTOR
JOSEPH R. BRUNSON
ADMINISTRATOR

3380 Americana Terrace
Suite 260
Boise, ID 83720-0036
(208) 334-6626
Fax (208) 364-1888

INFORMATIONAL LETTER #2001-11

DATE: October 31, 2001

TO: ALL IDAHO
NURSING FACILITIES
HOSPITALS
RESIDENTIAL CARE FACILITIES
AMBULATORY SURGERY CENTERS
INTERMEDIATE CARE FACILITIES FOR PERSONS WITH MENTAL RETARDATION

FROM: DEBBY RANSOM, R.N., R.H.I.T., Chief
Bureau of Facility Standards

SUBJECT: **TRANSFILLING OF SMALL PORTABLE LIQUID OXYGEN UNITS**

The '96 and '99 Editions of the NFPA Standard 99, Health Care Facilities, Section 8-6.2.6.2 provides the criteria regarding the transfilling of liquid oxygen. The language states that transfilling of liquid oxygen from one container to another shall be accomplished at a location specifically designated for the transfilling and meet three (3) specific criteria as follows:

1. Separated from any portion of a facility wherein patients are housed, examined, or treated.
2. The area is mechanically ventilated, is sprinklered, and has ceramic or concrete flooring.
3. The area is posted with signs indicating that transfilling is occurring.

In review of the Handbook for NFPA Standard 99, 1999 Edition, the following explanatory information is provided regarding Section 8-6.2.5.2:

"Despite the fact that transfilling small liquid oxygen containers at patient bedsides had been prohibited, the committee responsible for this text was aware that the practice was continuing in many health care facilities. As a response, the committee, in 1990, prescribed that transfilling be done remote from patient care areas. Since even this criteria has raised questions, the committee revised the wording again for 1996 to clarify where, and under what conditions, such transfilling is to be accomplished if it is done on health care facility property. CGA Pamphlet P-2.6 outlines specific procedures to be followed when transfilling liquid oxygen from one container to another.

"CGA Pamphlet P-2.7, a relatively new document that compliments CGA Pamphlet P-2.6, was developed specifically for health care facilities."

The real question comes in the third paragraph under Section 8-6.2.5.2 where it states that use and operation of small portable liquid oxygen systems shall comply with the requirements of CGA Pamphlet P-2.7. That question being, do the transfilling allowances for small portable units as set forth in Section 6 of CGA Pamphlet P-2.7 supercede the requirements set forth in Section 8-6.2.5.2 of NFPA Std 99? The explanatory information contained in the Handbook does not appear to answer that question.

This office has been in contact with the Senior Fire Protection Specialist with NFPA, the Idaho State Fire Marshal's office, and seventeen other states, six of which responded. From that information this office's position is that filling of the portable back pack units shall not be allowed to take place in a patient/resident room and that the standards set forth in Section 8-6.2.5.2 of NFPA Standard 99 shall apply.

Should you have any questions, please contact Roger Gehrke, Supervisor, Facility Fire Safety and Construction at 208/334-6626.

Debby Ransom

DEBBY RANSOM, R.N., R.H.I.T., Chief
Bureau of Facility Standards

DR/nah
cc: Idaho Health Care Association
Idaho Hospital Association
Idaho Residential and Assisted Living Association
Idaho Association of Community Options and Resources