



DEPARTMENT OF HEALTH & HUMAN SERVICES

Indian Health Service

Office of Environmental Health and Engineering
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April 25, 2025

Mr. Lokesh Nigam, P.E.
Fire Protection Engineer
Mr. Andrew Ochsankohl, P.E.
Fire Protection Engineer
Smith Group
455 N 3rd St. #250
Phoenix, AZ 85004

RE: Equivalency Request for Alternative Design Method: **Water only Deck Integrated Fire Fighting System (DIFFS) and Passive Deck Fire Retarding System** for Heliport Suppression

Mr. Nigam and Mr. Ochsankohl:

On Tuesday, March 25, 2025, the Smith Group, the Architect/Engineer design firm for the IHS Whiteriver Hospital project sent a letter through the IHS-Division of Engineering Services (DES) Project Manager, Mr. Scott Fillerup, to Mr. Denman Ondelacy, P.E., Acting Director, DES, who is also the IHS Authority Having Jurisdiction (AHJ) for the agency. The letter requests approval of an alternative code approach to the protection of the rooftop heliport fire protection design. The proposed alternative approach is a Water only Deck Integrated Fire Fighting System (DIFFS) and Passive Deck Fire Retarding System.

The DES Codes Committee reviewed your request and has made a recommendation (attached) . As the AHJ for the IHS, I concur with the DES Codes Committee recommendation that the equivalency request not be approved as no specific fire protection approaches, nor a fire risk assessment, were presented, that demonstrate the alternative provides equivalent or superior quality, strength, fire resistance, effectiveness, durability, and safety over those prescribed by Code. For an alternative approach to be approved, at least one (1) of the requirements in NFPA 418 7.7.1 Exceptions must be met. The Equivalency requested by the Smith Group does not meet this standard.

Denman Ondelacy

Denman Ondelacy, P.E.,
Acting Director, DES
AHJ for the IHS

Enclosure:

DES Codes Committee Memorandum dated 04/24/2025

Smith Group Equivalency Request for Alternative Design Method dated 02/13/2025

cc:

David Farley, P.E., Phoenix Area

Scott Fillerup, P.E., DES PM, P.E.

Paul Gagliano, P.E., DES Chief AE Branch

Nick Lu, SE, P.E., DES Codes Committee, Chair