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Re/Emergency Rule Petition Statement

The inspection requirement of fuel-gas piping systems for mobile food units, as required under IFC Section 319.10.3, is currently not supported by sufficient service capacity within Washington State. Qualified providers capable of performing these specialized inspections are limited, and the existing infrastructure is not adequate to meet the immediate statewide demand created by this requirement.

As a result, immediate full compliance is not feasible for a significant portion of the industry. Enforcing this requirement without accommodation would create an undue burden on small businesses and could lead to widespread operational disruptions.

This petition recommends that the authority having jurisdiction be permitted to implement a phased compliance period of two to three (2–3) years. During this phase-in period, compliance progress would be evaluated as part of the annual food truck fire permit inspection conducted through the Washington State Association of Fire Marshals (WSAFM) Mobile Food Unit Program.

This approach ensures that public safety objectives are maintained while providing a practical and achievable pathway for compliance. It also allows time for the development and expansion of qualified inspection services within the state.

Supporting documentation, including correspondence from the Seattle Assistant Fire Marshal, confirms the current lack of available inspection providers and reinforces the need for a phased implementation approach.

Thank you for your attention to this urgent matter.

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