

December 9, 2021

Commonwealth of Massachusetts Board of Building Regulations and Standards  
1 Ashburton Place, Unit 1301  
Boston, MA 02108

To Whom It May Concern:

The Devens Enterprise Commission, acting in its capacity as the Board of Health within the Devens Regional Enterprise Zone and in consultation with the Devens Fire Department and our building code officials, is writing this letter regarding John Matthey (JM)'s building code variance request to expand the allowable number of Control Areas on the first and second levels of Building 1 (IBC Section 414, {F}, 414.2.2 and Table 414.2.2) of their 25 Patton Road complex at Devens.

After our meeting with JM and the Design Group (JM's contractor) and review by the Devens Fire Department and Building Commissioner, we believe the proposed variance would not negatively impact the life safety of this facility for the following reasons:

- If the variance is approved, the number of Control Areas would increase but in turn become smaller separated areas where the solvents are used in the process manufacturing operations.
- Current movement of solvents throughout the facility to and from the hazardous storage area located in a separate building would be significantly reduced because of these additional Control Areas.
- The aggregate volume of flammable and combustible liquids currently licensed and permitted by the Commission and Devens Fire Department for this multi-building site will not be increased by this variance application, the variance would result in a reconfiguration of Control Areas.

The DEC has no objection to the granting of this variance provided the existing K-5.6 standard orifice sprinklers are replaced with ½-inch NPT, K-8.0 large orifice sprinklers to accommodate flow for the increased fire sprinkler density as outlined in the December 8, 2021 letter from Thomas Dalferes, Fire Protection Engineer (PE No.42481) for the Design Group, to Devens Fire Department Chief Tim Kelly.

At its meeting of December 9, 2021, the Commission voted to send this letter of no objection to the BBRS regarding the variance requested by Johnson Matthey.

On behalf of the Commission;

Peter Lowitt, FAICP Director