

STATE BUILDING CODE INTERPRETATION NO. I-16-10

January 31, 2011

The following is being offered in response to your fax request dated December 8, 2010 in which you seek a formal interpretation. These questions would apply to Sections 1008.1.8.3 and 1008.1.9, of the 2003 International Building Code portion of the 2005 State Building Code.

Scenario:

"The scenario is an assembly (A3) occupancy where teenagers will gather for recreation. Games will be provided and bands will perform. The occupancy load is under three hundred. Two means of egress are to be provided, one at the main entrance and the other at the rear of the space."

Question #1:

"Would a key operated device be allowed at the main entrance if the requirements of 1008.1.8.3 are met since this seems to be in direct conflict with Section 1008.1.9 which requires panic devices in assembly occupancies that have an occupant load of one hundred or more?"

Answer #1:

A key operated device would be permitted only if it was a panic hardware latching device for your scenario's main exit. A panic hardware latching device is required when the occupant load is 100 occupants or greater. Panic hardware is designed as having special locking and latching characteristics. This hardware can unlatch and unlock a door in the direction of egress by a single action by imposing a 15 pound force.

Question #2:

"Part 2.1 of Section 1008.1.8.3 states that the locking device must be readily distinguishable as locked. What specifically would satisfy this requirement?"

Answer #2:

The International Code Council (ICC) publishes a commentary document for the 2003 International Building Code. In part, the commentary offers the following guidance for Section 1008.1.8.3, Part 2.1:

"Exception 2 permits a locking device, such as a double-cylinder dead bolt, on the main entrance door. Such locking devices must have an integral indicator that automatically reflects the "locked" or "unlocked" status of the device." ... "The locking arrangement is not permitted on any door other than the main exit and, therefore, the employees, security and cleaning crews will have access to other exits without requiring the use of a key."