

## STATE BUILDING CODE INTERPRETATION NO. I-8-02

April 9, 2002

The following is offered in response to your letter to me in which you request a formal interpretation of the provisions of the 1999 State Building Code regarding the use of recessed pits in private and/or public garages.

**Question One:** Are pits allowed in private (residential) and/or public (commercial) garages?

**Answer One:** Yes. There is no language in either the 1995 CABO One and Two Family Dwelling Code or the BOCA National Building Code/1996 portion of the 1999 State Building Code that prohibits the installation of recessed pits in the floors of either private or public garages.

**Question Two:** If yes, what safety concerns are there?

**Answer Two:** Each of the referenced codes contain information regarding issues such as ventilation, fall protection and electrical requirements.

The requirements found in CABO, since it deals prescriptively with Use Group R-4 One- and Two-Family Dwellings and One Family Townhouses, are less restrictive than those found in BOCA. For instance, CABO contains no specific ventilation requirements for garages, and the only applicable electrical requirement would be for GFCI protected convenience receptacles in any portion of the garage that does not meet the exceptions of article 210-8 (2) of the 1999 National Electrical Code. Since the installation of a guardrail around a pit in a private garage would negate the pit's usefulness, another form of fall protection, such as a removable structural floor panel would have to be utilized to protect any pit that is more than 30 inches below the surrounding garage floor when such pit was not in use.

The BOCA Code, which regulates all other Use Groups, provides a more definitive path to ventilation and electrical requirements. Ventilation requirements for both private and public garages can be found at section 403.3 of the 1996 International Mechanical Code. Electrical requirements for private garages would mirror those mentioned above, but commercial (Public) garages must follow the requirements of article 511-3 (a) of the 1999 National Electrical Code for any pit or depression below the garage floor level. With respect to fall protection, once again, it would be appropriate to provide a removable structural floor panel for a private garage constructed under the BOCA Code, but such a solution is impractical for public garages. Although section 1005.5 of the BOCA Code does not contain a specific exception for pits in public garages, the exceptions noted for loading docks, stages and platforms indicate that the code recognizes that the installation of guards at certain locations is impractical and therefore exempts such areas. Conversations with OSHA representatives indicate that

since rapid turnover of vehicles being serviced in most facilities with pits results in a vehicle covering the pit most of the time, they only require fall protection at times when the pit will be uncovered for an extended period of time. They feel that temporary guards, temporary covers or the utilization of warning tape, together with restricted access by the public and education of employees provides adequate fall protection for pits in Public Garages.