

## STATE BUILDING CODE INTERPRETATION NO. I-56-00

August 25, 2000

The following is offered in response to your letter in which you request a formal interpretation of the provisions of Chapter 34, of the BOCA National Building Code/1996 portion of the 1999 State Building Code, as it applies to renovations to existing buildings.

**Question:** A complete “gut “ renovation of an existing high school is being undertaken to utilize the building as an intermediate school. The building exceeds the current Table 503 area limits, as modified in accordance with Section 506.0. Must the entire building be made code-compliant as a result of the renovation? If so, is there a requirement to add firewalls to bring the building into compliance with Table 503?

**Answer:** The answer to both questions is no. Section 202, of the BOCA National Building Code/1996 portion of the 1999 State Building Code, defines *Alteration* as any construction or renovation to an existing structure other than repair or addition. Since this project involves renovation without addition or change of occupancy, it is therefore an alteration in the eyes of the code. Section 3404.2 of the referenced code states, in part, that an alteration to any structure shall conform to the code requirements for a new structure and shall not result in an increase in hazard to the occupants. This section further states that portions of the structure not altered and not affected by the alteration are not required to comply with the code requirements for a new structure. In the example you set forth, there is no change of use group or change of occupancy to dictate code-compliance for the entire building. Any new work must be code-compliant, but existing items that were code-compliant at the time of installation may remain as-is as long as they do not represent an unsafe condition.

Speaking specifically to the non-compliant area of the building, the renovation is not affecting the area of the building in a negative way, so the code does not mandate the installation of firewalls to reduce building area. If, however, additions were contemplated to increase the already non-compliant area of the building, fire walls, an increase in construction classification or other measures to increase the allowable area would be required to make the structure compliant with Table 503, as modified.