

## STATE BUILDING CODE INTERPRETATION NO. I-2-03

April 2, 2003

The following is offered in response to your April 1, 2003 letter to me in which you seek a formal interpretation of the provisions of Section 2600 of the 1995 CABO One and Two Family Dwelling Code and Section 1300 of the 1996 International Mechanical Code portions of the 1999 State Building Code with respect to the location of above-ground LP gas tanks in relationship to building openings.

**Question:** Can a propane tank be installed directly beneath a window at a residence or at a commercial building?

**Answer:** The answer is yes for Use Group R-3 residences and any other building regulated by the 1996 International Mechanical Code (IMC), but no for any Use Group R-4 one- or two-family residence or townhouse constructed under the 1995 CABO One and Two Family Dwelling Code (CABO). Both the IMC and the Connecticut Liquefied Petroleum Gas and Liquefied Natural Gas Code (which applies to all buildings constructed in the State) reference NFPA 58-1995 for tank installation. NFPA 58 requires, at Section 3.2.2.2 (b), that cylinders located alongside of buildings shall be located and installed so that the discharge from the cylinder pressure relief device is at least 3 feet horizontally away from any building opening that is below the level of such discharge. Table 2611.2 of the CABO Code requires that DOT tanks less than 125 gallon water capacity be located with the pressure relief device a minimum of 3 feet horizontally from any building opening and ASME tanks less than 125 gallon water capacity be located with such device a minimum of 5 feet horizontally from any building opening. The CABO Code does not specify that the regulated openings must be below the level of discharge from the device.

In view of the fact that there are two regulations that dictate the location of the tanks with respect to building openings, both must be adhered to. This means that in addition to the requirements of NFPA 58-1995, for one- and two-family dwellings and townhouses constructed as Use Group R-4 under the CABO Code, the tanks must be a minimum of 3 or 5 feet (depending on tank) from any building opening. This precludes the location of a tank under a window in an R-4 dwelling.