

STATE BUILDING CODE INTERPRETATION I-02-07

March 2, 2007

The following is offered in response to your February 6, 2007 letter to me in which you seek a formal interpretation of the provisions of both the 1999 State Building Code and the 2005 State Building Code with respect to single membrane penetrations required by items that do not serve the exit stair in walls surrounding fire-resistance rated exit stair enclosures.

Question: Does the code allow single membrane wall penetrations (such as light switches, wall sconces, fire extinguisher cabinets and convenience receptacles) in fire-resistance rated wall assemblies that comprise exit enclosures?

Answer: No. Both the 1999 State Building Code and the 2005 State Building Code prohibit any penetrations (through or single membrane) in assemblies that comprise fire-resistance rated exit enclosures. This prohibition is found at Section 1014.11.2 of the BOCA National Building Code/1996 portion of the 1999 State Building Code and at Section 1019.1.2 of the 2003 International Building Code portion of the 2005 State Building Code. Although the language of the two sections differs slightly, the intent of the two sections is the same. Penetrations into or through an exit enclosure of any piping, conduit or equipment that does not serve the stairway is prohibited. When one goes to Chapter 7 in the respective codes one finds that the penetration requirements are separated into through penetrations and membrane penetrations. Even though such penetrations are treated in different manners, they are both considered penetrations and are thus both prohibited for any items that do not serve the stairway. A light switch that does not control lights within the stairway is not permitted to penetrate the membrane on either side of the enclosing wall. A manual pull station, however, is associated with use of the means of egress and required to be located near the exit door, and would thus be permitted to penetrate the membrane provided it is properly protected.