

## **STATE BUILDING CODE INTERPRETATION NO. I-01-00**

January 3, 2000

The following is offered in response to your letter in which you request a formal interpretation of the provisions of Sections 904.1 and 904.8 of the BOCA National Building Code/1996 portion of the 1999 State Building Code.

**Question:** Are the requirements of Sections 904.1 and 904.8 in conflict with one another? Would Section 904.8 allow a two story hotel with 160 rooms with direct access to the exterior by doors to a balcony to be built without fire suppression?

**Answer:** The answer to both questions is no. Although upon retrospect it seems that during the code adoption process Section 904.8 could have been re-written to avoid confusion, there is no conflict between the two sections. Section 904.1 sets forth the requirement found in Connecticut General Statute Section 29-315 that states that an automatic fire extinguishing system shall be installed in any hotel or motel having six or more guest rooms and providing sleeping accommodations for more than sixteen persons for which a building permit for new occupancy is issued on or after January 1, 1987. Section 904.8 of the code requires a fire suppression system in all buildings with a Use Group R-1 fire area. The exception to 904.8 states that where all guest rooms are not more than three stories above the lowest level of exit discharge and each guest room has at least one door opening directly to an exterior exit access which leads directly to the exits, the fire suppression system is not required. This does not mean that the requirements of Section 904.1 can be overlooked.

Keep in mind that the body of Section 904.8 requires a suppression system in all Use Group R-1 fire areas. It is the exception that causes the confusion. With the requirements of 904.1 in place, the exception to 904.8 would allow a three story R-1 fire area with sixteen single occupancy rooms providing sleeping accommodations for 16 persons, or up to five rooms with sleeping accommodations for any number of people (since both elements of 904.1 must be present to trigger the requirement for fire suppression) as long as the requirements in the exception are met with regard to doorways. Section 904.8 under no circumstances would permit a Use Group R-1 fire area to be constructed that exceeded the limits of six or more guest rooms and providing sleeping accommodations for more than 16 persons.