The following is offered in response to your letter to me dated June 3, 2015, in which you ask for a formal interpretation of the above mentioned code sections.

Scenario: Section R316.4 of the 2009 International Residential Code portion of the 2005 State Building Code requires in part that all foam plastic shall be separated from the **interior of a building** by an approved thermal barrier. Section R702.3.4 of the same code requires that foam plastics used in insulating concrete form walls on the interior of **habitable spaces** be protected by a thermal barrier in accordance with Section R316.4 of the above mentioned code.

**Question:** Do foundation walls constructed with insulation concrete forms (foam plastic insulation) that are located within non-habitable basements required to be protected with a thermal barrier in accordance with Section R316.4?

**Answer:** Yes. Section R702.3.4 requires in part that foam plastic concrete form walls comply with Section R611. Section R611.4.2 requires that stay-in-place forms constructed of rigid foam plastic shall be protected on the **interior of the building** as required by **both** Sections R316.4 and R702.3.4.