

# ***Versteeg Associates***

Code Compliance & Fire Safety Consultants

86 University Drive  
Torrington, CT 06790  
860-480-3951  
*josephversteeg@gmail.com*

## **Public Comment**

**Re: Proposed 2022 CFSC – Part I; Section 107**

**I. As proposed in the Draft For Public Comment – January 31, 2022**

(c) The minimum requirements for the frequency of inspections as prescribed in section 29-305 of the Connecticut General Statutes shall be as follows: Note: the definitions for the classification of the occupancies is found in Part III Section 202 of this code.

1. Annual inspections for the occupancy classifications all R Residential, A-1, A-2, E, H-1, I-1, M selling consumer fireworks (1.4G), H-3 containing consumer fireworks (1.4G).
2. Inspections every two years for the occupancy classifications A-3, H-2, I-2, I-3, I-4, B-Medical, B-College.
3. Inspections every three years for occupancy classifications B, H-3, M, S-1, A-4, A-5.
4. Inspections every four years for the occupancy classifications F-1, F-2, H-4, H-5, S-2, U.

**II. Statement of Concern.**

As worded, the inspection schedule only addresses occupancies within Part II of the CFSC since the acronyms used are not found in Part of the Code. Part IV of the Code uses words to identify the occupancies. If the intent is to alter the inspection schedule for occupancies within Part IV, the occupancy classification title should be added. For example, ...occupancy classification B, Business; R-2, Apartment Buildings and Dormitory Occupancies...

Respectfully,

*Joseph H. Versteeg*

Joseph H. Versteeg

March 13, 2022

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## **Public Comment**

**Re: Proposed 2022 CFSC – Part III; Section 119.1**

**I. As proposed in the Draft For Public Comment – January 31, 2022**

(Add) **119.1 Mixed Use and Occupancy.** The provisions of Section 508 of the 2021 *International Building Code* portion of the 2022 Connecticut State Building Code except as noted below shall also be considered requirements of this Code and known as the 2021 *International Building Code*, Section 508 portion of the 2022 Connecticut State Fire Safety Code.

**Exception:** Sections 508.5.9 and 508.5.11 addressing Accessibility and Plumbing Facilities respectively are not adopted as part of the 2022 Connecticut State Fire Safety Code. **Sections within 508.2, 508.3, and 508.4 addressing building height and area are not adopted as part of the 2022 Connecticut State Fire Safety Code.**

**II. Statement of Concern.**

As written, the Exception only exempts the Fire Official from enforcing the Accessibility and Plumbing provisions of the Building Code. It does not prevent the Fire Official from applying the building height and area calculations. The exception requires re-wording.

Respectfully,

*Joseph H. Versteeg*

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## **Public Comment**

**Re: Proposed 2022 CFSC – Part III; Section 503 and Appendix D**

### **I. As proposed in the Draft For Public Comment – January 31, 2022**

(Amd) **503.1 Where required.** Fire apparatus access roads shall be provided and maintained in accordance with section 503.1.

(Amd) **503.1.1 Buildings and facilities.** *Approved* fire apparatus access roads shall be provided for every facility, building, or portion hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of Appendix D.

(Amd) **503.1.2 Additional access.** The fire code official in conjunction with the fire chief is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climate conditions or other factors that could limit access.

### **II. Statement of Concern.**

The originally submitted proposed code change replaced Section 503 and Appendix D with a reference to the requirements in the Fire Prevention Code. In doing so the requirements in NFPA 1 and the Annex notes would be applicable. Although the wording of NFPA 1 has been incorporated into Annex D, the extremely informative NFPA Annex notes have not.

I strongly suggest the simple wording as originally proposed be reconsidered. Yes, it forces the user to open the CSFC Part III to find the requirements are in the CFSPC, but it is clear and concise. It also establishes a single document for these requirements.

Respectfully,

*Joseph H. Versteeg*

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## **Public Comment**

**Re: Proposed 2022 CFSC – Part IV; Section 7.1.3.2.1**

### **I. As proposed in the Draft For Public Comment – January 31, 2022**

(Amd) 7.1.3.2.1 Where this Code requires an exit to be separated from other parts of the building, the separating construction shall meet the requirements of Section 8.2 and the following:

(1) \*The separation shall have a minimum 1-hour fire resistance rating where the exit connects three or fewer stories. Existing wall or ceiling finishes consisting of wood or metal lath and plaster in good repair satisfy this requirement in non-high-rise buildings.

(2) The separation specified in Section 7.1.3.2.1(1), other than an existing separation, shall be supported by construction having not less than a 1-hour fire resistance rating.

(3) \*The separation shall have a minimum 2-hour fire resistance rating where the exit connects four or more stories, unless one of the following conditions exists.

(a) In existing non-high-rise buildings, existing exit stair enclosures shall have a minimum 1-hour fire resistance rating. Existing wall or ceiling finishes consisting of wood or metal lath and plaster in good repair satisfy this requirement in non-high-rise buildings.

(b) In existing buildings protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7, existing exit stair enclosures shall have a minimum 1-hour fire resistance rating.

(c) The minimum 1-hour enclosures in accordance with Sections 29.2.2.1.2, and 31.2.2.1.2 shall be permitted as an alternative to the requirement of 7.1.3.2.1(3).

### **II. Statement of Concern.**

The wording added to Section 7.1.3.2.1(1) recognizes existing lath and plaster exit stair assemblies in good repair satisfy the 1-hour requirement as applied by municipal fire marshals throughout Connecticut since 1971. It also limits this type of construction to non-high-rise buildings as permitted in (3)(a). Its use would not be permitted in sprinklered high-rise buildings per (3)(b).

Respectfully,

*Joseph H. Versteeg*

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## **Public Comment**

**Re: Proposed 2022 CFSC – Part IV; Section 13.4.7.7.1**

### **I. As proposed in the Draft For Public Comment – January 31, 2022**

Delete the Sections 13.4.7.7.1, 13.4.7.7.2, & 13.4.7.7.3 as printed in the proposed CT Amendments and replace with the following:

**13.4.7.7.1** On every legitimate stage, the main proscenium opening used for viewing performances shall be provided with one of the following proscenium opening protection methods as follows:

- (1) The proscenium opening protection shall comply with 12.4.7.7. be protected by a listed, minimum 20-minute opening protective assembly, a fire curtain complying with NFPA 80, Standard for Fire Doors and Other Opening Protectives, or an approved water curtain complying with NFPA 13, Standard for the Installation of Sprinkler Systems.
- (2) Asbestos shall be permitted in lieu of a listed fabric.
- (3) Manual curtains of any size shall be permitted.

**13.4.7.7.2** as worded in NFPA 101 remains

**13.4.7.7.3** Proscenium opening protection provided by other than a fire curtain in accordance with 12.4.7.7 (see 13.4.7.7.2(1)) **13.4.7.7.1** shall activate upon automatic detection of fire and upon manual activation.

### **II. Statement of Concern.**

This section of the Code has always been very confusing. My proposal simply states that proscenium openings can be protected by any one of four methods, the three contained in 13.4.7.7.1 (1), (2), or (3) and 13.4.7.7.2.

The wording of 12.4.7.7 has been included in 13.4.7.7.1(1) since 12.4.7.7 is not adopted in CT and does not appear in the NFPA CT reprint.

13.4.7.7.3 has been amended to reference 13.4.7.7.1(1) directly.

Respectfully,

*Joseph H. Versteeg*

Joseph H. Versteeg

March 13, 2022