



Memorandum

Date:	April 3, 2017
To:	Municipal Building Officials and Fire Marshals
From:	Joseph V. Cassidy, P.E., State Building Inspector William Abbott, State Fire Marshal
Subject:	Permitting of Propane, Gas and Oil Installations in other than Residences

The purpose of this memorandum is to clarify the responsibilities and authorities of the local Building Official and local Fire Marshal as they relate to gas, oil and propane installations in other than one-two family homes and townhouses.

Issue:

Who has the authority to issue permits, inspect and approve installations of natural gas, propane or oil systems for non-IRC buildings?

Background:

Prior to the recent code adoptions, installation and operation of natural gas, propane, oil and other flammable liquid storage systems were governed in a series of Connecticut General Statutes commonly referred to as the "haz-mat codes". These "codes" were adopted by referenced in the Fire Safety Code (FSC), the Fire Prevention Code (FPC) and the State Building Code (SBC). This arrangement changed with the incorporation of these "codes" into the 2015 FPC and has created some uncertainty as to who has jurisdiction over these issues now.

While the statutes direct inclusion of regulation of these "haz-mat" issues into the FPC, they do not specifically preclude adopting those requirements in other codes. In fact, we do adopt them into the International Residential Code portion specifically because the FPC does not apply to one and two family homes. We all agree that this appropriate. We also incorporate these requirements by reference into the 2016 SBC through the International Building Code portion section 101.4.1 by identifying references to the International Fuel Gas Code throughout the SBC

to mean NFPA 2, 54, 58 as adopted in the FPC. If we conclude that the inclusion of the “regulations” in the IRC is not in conflict with the statutory direction, then we need to draw the same conclusion for the IBC 101.4.1 reference.

Guidance:

Given that the requirements for these systems are included in all three Codes, the building official may issue permits for them.

Inspection responsibility may be coordinated, and reports shared, between the building official and fire marshal by virtue of the cooperation sections included in each Code (IBC 104.4, FSC 108, FPC 29-291a-9a 1.7.4).