

STATE BUILDING CODE INTERPRETATION I-03-07

March 2, 2007

The following is offered in response to your February 13, 2007 FAX to me in which you seek formal interpretations of Sections 1011.1.1, 1011.1.1.1 and 1011.1.2 of the 2003 International Building Code (IBC) portion of the 2005 State Building Code as they pertain to floor proximity exit signs and accessible exits.

Question 1: Are low level exit signs required only at egress door locations or are they required at all exit sign locations along the path of egress travel?

Answer 1: Floor proximity exit signs are required only in certain occupancies (Group A with over 300 occupants; Group B medical occupancies as defined by Section 420; Groups I-1 and I-2; Group R-1 hotels and motels; and Group R-2 dormitories) and only at exit doors (doors serving exit enclosures, horizontal exits or leading to exit discharge). Thus, even in the specified occupancies, floor proximity exit signs are not required at exit access doors or at other exit sign locations required by spacing and visibility concerns.

Question 2: In a case where there is insufficient space on the wall in the same plane as the door to mount the low level exit sign is it permissible to mount it on a side wall (at 90 degrees to the door) with a chevron pointing to the door?

Answer 2: The code requires that the floor proximity exit sign be mounted with the nearest edge of the sign within 4 inches of the door, but does not require that the sign be mounted in the same plane as the door. The arrangement you describe would be code compliant as long as the sign is within 4 inches of the edge of the door.

Question 3: Where an exit door is held open on a magnetic hold-open device that automatically closes the door upon sounding of an alarm, does the intent of the code allow the low level exit sign to be covered by the door in its open position as long as such sign is visible when the door is closed after sounding of the alarm?

Answer 3: Yes. The intent of adding the floor proximity exit signs in addition to those required by Section 1011.1 is to insure that exit signs on or near exit doors remain visible during heavy smoke conditions that may obscure the exit signs in conventional high locations. Since the floor proximity exit sign would become visible immediately upon activation of an alarm and closing of the door, well before smoke banking became an issue, the intent of the code is met by the situation you describe.

Question 4: Section 404.2.9 of the 2003 ICC/ANSI A117.1 standard requires smooth door surfaces within 10 inches vertically from the floor. Section 1011.1.1.1 of the IBC allows the floor proximity exit sign to be mounted on the door, potentially resulting in a door surface that is not smooth. Which requirement prevails in case of a conflict?

Answer 4: Section 102.4 of the IBC states "Where differences occur between provisions of this code and referenced codes and standards, the provisions of this code shall apply." The IBC would thus prevail, permitting mounting of the sign on the door.

Question 5: Are the International Symbol of Accessibility signs required by Section 1011.1.2 of the IBC also required at low level exit signs?

Answer 5: Yes. The scoping language of Section 1011.1.2 requires accessibility signs in addition to the signs required by Sections 1011.1 and 1011.1.1. Since 1011.1.1 is the section that requires floor proximity exit signs, it follows that such signs must be accompanied by the International Symbol of Accessibility in accordance with Section 1011.1.2. In fact, the proponent of 1011.1.2 specifically mentioned the need for the symbol at the low level based on the needs of wheelchair users.

Question 6: Are the International Symbol of Accessibility signs required at all exit sign locations required by Section 1011.1 or only at egress door locations?

Answer 6: A careful reading of Section 1011.1.2 reveals that the accessibility symbol is only required to be added to exit signs (both high level and floor proximity per Answer 5 above) at accessible exits at the level of exit discharge that lead directly to accessible paths of exit discharge. Thus, a grade level door designated as an accessible exit that leads to grade or to a compliant ramp leading to grade would require addition of the accessibility sign. The intent is to alert persons with mobility impairments of the location of exits that they can traverse unassisted.

Question 7: Are Area of Refuge signs required at the low level location?

Answer 7: No.