

2016 State Building Code Public Comments

	Proponent	Comment	Response	Action
1	Colletti	<p>Upon reviewing the table in Appendix "R", It appears you're stating that ALL buildings, regardless of the "Seismic Use Group" classification will fall into Seismic Design Category "B" and / or rarely "C". It's as if you are only taking the "Soil Class" into account and not the necessity of the building to function post earthquake, such as Hospitals, Surgical Centers, Emergency DOT facilities, Police Departments, Fire Departments, Emergency Shelters, etc... You would also want to take into consideration the contents of the systems or the systems themselves, such as Natural Gas, Medical Gas, Steam, Acid Waste, Emergency Power systems and components (Generators, Exit Signs, Emergency Lighting, Transformers, Fuel to Generator, Exhaust from generator, etc...) and all of the systems that feed these components. Is this appendix intended to supersede the seismic design categories that the code would typically require for projects based on use group? For example essential facilities in the unmodified code would fall into Seismic Design Category A, C or D/E/F – an essential facility does not have the option of SDC=B in the unmodified code. Per Appendix R, are we making essential facilities fall into a SDC=B and excluding the seismic requirements that would normally accompany these projects?</p>	<p>Appendix R pertains to the International Residential Code portion of the proposed code, which regulates one- and two-family detached residences and townhouses. Appendix N of the International Building Code (IBC) portion of the proposed code regulates all other structures, such as hospitals, etc. This appendix is correctly referenced in the amendment to Section 1613.3.1 of the IBC.</p>	None
2	Ballaro	<p>I would think that giving a Certificate of Approval would be redundant, because we give approvals with the inspections. It would just create more paperwork and more time and labor needed for ALL permits. In my experience people tend to not even pick up their CofO's until they need them to sell their homes. I would like you to re-think that amendment.</p>	<p>Certificate of Acceptance is not a new addition to the State Building Code. This certificate is necessary as it is the administrative closure for an active permit for work not requiring a Certificate of Occupancy.</p>	None

3	Summers	Letter dated 6/29/16 with various editorial corrections	<p>IRC #2. This amendment is properly worded. For an existing house with a certificate of occupancy, all of the space including garages, attics and basements are considered an R occupancy. The code does not consider the conversion of a garage or finishing a basement creation of new space, nor is it a change of use. Therefore a certificate of acceptance is proper form of closure for a permit for such work. IRC #5. This amendment is properly worded. A window well drain, although is may be exposed to surface water, performs the same function as a foundation drain, that is protecting the basement. IRC #9. This amendment is properly worded. If an active radon mitigation system becomes necessary, the fan would still need to be installed in what would otherwise be an inaccessible attic.</p>	Corrections Made
		Several comments - Correlation of NFPA standard editions between the Fire Safety, Fire Prevention and Building Code	Concur	Changes made

4	Steadward	In reference to our amendment 1011.1.1, the currently required accessible exit sign is about 10 times more expensive than a similar “non-accessible” exit sign. The new statute is now mandating a sign that does not exist to my knowledge and will cause either large financial hardships to create custom signage	The requirement for the “active” International Symbol of Accessibility is a statutory requirement (CT Public Act 16- 78) and thus this must be included in this code. If availability of signage becomes an issue after adoption of this code, the code modification process may need to be utilized to allow for the issuance of certificates of occupancy for a period of time.	None
5	Schemmel	It seems that the amendment 1608.1.1 (requiring that the flat roof snow load shall not be less than 30 psf) is overly conservative especially for site locations with 30 psf or 35 psf ground snow loads. For example if using $P_g=30$ psf, $C_e=1.0$, $C_t=1.2$, and $I=1.0$: $P_f = 0.7 C_e C_t I P_g = 0.7 * 1.0 * 1.2 * 1.0 * 30 = 25.2$ psf So basically the amendment is the equivalent that any building in a 30 psf ground snow load area needs to be treated as an unheated Risk Category IV building ($P_g=30$ psf, $C_e=1.0$, $C_t=1.2$, and $I=1.2$): $P_f = 0.7 C_e C_t I P_g = 0.7 * 1.0 * 1.2 * 1.2 * 30 = 30.2$ psf That seems to be significantly overly conservative for buildings that are Risk Category I or II, thus unnecessarily adding significant costs to those buildings.	The 30 psf minimum flat roof snow load has been a requirement for the past 22 years. This load is greater than that which would be derived using the provisions of ASCE 7. Had it not been for this minimum design load, there would undoubtedly been a significantly greater number of roof collapses during the 2010/2011 winter. The committee deemed that it would not be prudent to reduce this minimum requirement for Risk Category II structures which constitute the overwhelming majority of the structures that are built in Connecticut.	None
6	Vigneau	Utilize IECC Table R4024.1.1 from the 2015 edition for clarity	Will be considered in the next cycle	None
		Utilize language from 2015 IECC C103.2 in lieu of 2012 language for clarity	Will be considered in the next cycle.	None
7	Scully	Proposed additional language in Section 412.5 Connection required: This section concerns floor drain connections, and it stipulates floor drains shall connect to an on-site holding tank when the discharge contains hazardous substances, petroleum-based oil, etc. It also indicates that interceptors and separators shall be provided in accordance with Section 1003 (Interceptors and Separators) when floor drains connect to the sanitary sewer system, and they shall be installed in accordance with the Public Health Code (PHC). However, the PHC doesn’t include installation requirements for interceptors and separators on public sewer connections. It is recommended that reference to the PHC be eliminated. The Department of Energy and Environmental Protection (DEEP) has General Permits and regulations that govern holding tanks, grit and oil separators at certain establishments (e.g., vehicle maintenance, food processing, and “454” wastewaters), and it is recommended DEEP be consulted for appropriate language if reference to other requirements beyond those in Section 1003 is desired.	The reference in 412.5 was changed to identify DEEP regulations.	Section changed

		<p>☒ Proposed amended language in Section 701.2 Sewer required: This section stipulates that buildings with plumbing fixtures shall be connected to a public sewer where available. The Department of Public Health’s septic system codes were revised many years ago to eliminate the stipulation that septic systems can only be used when public sewers are not available. Requirements for public sewer connections are established by local Water Pollution Control Authorities, and some do not mandate connection when sewers are available. It is recommended that the word “available” be replaced with the word “required”.</p>	Language in 701.2 changed to required.	Section changed
8	Costantini	Is the swing bar no longer required? Cannot find any reference for this requirement in the new code as prescribed by the current 2005 CT/IBC Building Code, Section 1109.2.4.	This section of the amendment was deleted to better align with the model code requirements.	None
9	Elliot	In 425.1.1 – Exception, it would be appreciated if clarification can be made regarding the independent stairway or ramp. It was explained to me in an inquiry at OSBI that the independent stairway refers to the primary means of egress in multi-occupant spaces. Older students may use the dedicated stair or ramp as a secondary means in the case that their primary means is blocked and vice versa. In other words, the intent of the exception does not imply a doubling of the means of egress for shared multi-occupant spaces.	The intent of the exception is to allow classrooms for the youngest students on other than the level of exit discharge, but only in the case that the space to be used has a dedicated egress for those students. We will review this issue in the next code cycle.	None.
10	Torbin	Regarding the installation of corrugated stainless steel tubing (CSST) gas piping systems, the adoption of the new state codes will cause unnecessary confusion for both installers and inspectors. As currently stipulated in the new state codes, all new buildings will require additional electrical bonding of both “yellow” and “black” CSST products. However, the CT Fire Safety Code will invoke the 2015 NFPA 54 Code while one and two family residential construction will invoke the 2012 International Residential Code. The CSST bonding requirements are significantly different in these two codes inevitably leading to confusion among plumbers and inspectors. Currently, in the CT State Building Code, CSST is bonded in accordance with the CSST manufacturer’s installation instructions which do not require the extra bonding of black arc-resistant CSST. To my knowledge, arc-resistant black CSST (such as our CounterStrike product) has been installed in Connecticut since 2007 without any additional bonding and without any reported damage due to lightning induced arcing. Many of our trained installers in Connecticut have grown accustomed to installing the black CSST without extra bonding, and the proposed change will add cost for the consumer.	The references to NFPA 54 have been revised in both the building and fire safety codes. The requirements in all three codes – building (including the IRC portion of the State Building Code), fire safety and fire prevention are identical.	None

11	Lacey	At a minimum, the duct tightness requirement should be further improved to require testing to 4cfm per 100 sq. ft, possibly with some trade-off flexibility.	This change was prompted by a concern for the industry to be able to meet the model code threshold. This requirement will be reevaluated during the next cycle.	None
		Low-rise attached dwelling units should still be required to achieve reasonable air tightness, or at least improve other aspects of the building to replace the efficiency lost.	This change was prompted by a concern for the industry to be able to meet the model code threshold. This requirement will be reevaluated during the next cycle.	Noe
		Every residential building should be objectively tested for air leakage; sampling of some buildings cannot guarantee the same results.	This change was prompted by a concern for the industry to be able to meet the model code threshold. This requirement will be reevaluated during the next cycle.	None
		Buildings certified through residential and commercial above-code programs should still meet the energy code.	The language in C102.1.1 and R102.1.1 does include requirements to meet the mandatory requirements of the IECC.	None
12	Versteeg	Extend the time limitation of temporary tents, air-inflated, air-supported, and tensioned membrane structures from 180 to 240 consecutive days based on the unique climate needs of Connecticut. The extended time frame is specifically limited to tents and membrane structures and will more appropriately reflect the needs of Connecticut.	Because this introduces a new concept, we will consider this in the next code cycle.	None
13	Cohn / Floren	Requesting to include SVRS and/or vacuum diffusion systems in addition to the requirements of the APSP-7 standard for new pools referenced in the 2012 IRC portion of the code.	Because this introduces a new concept, we will consider this in the next code cycle.	None
14	Port	Wood frame wall or building envelope insulation (Table 402.1.3) The U-factor table for frame walls was amended from 0.057 to 0.060, thus weakening the insulation values of the wall if the builder chooses to use the U-factor path. In the simplest terms, this allows builders to use a less expensive insulation (less isolative) product and make assumptions that the insulation value of sheathing and siding makes up the difference in the insulation value.	The intent of the U-factor method is to evaluate the wall as an assembly. Therefore it is reasonable to consider all of the components of the wall in calculating its thermal resistance. This requirement will be reevaluated during the next cycle.	None
		Testing for Air Leakage (R402.4.1.2 Testing) The proposed amendment to exempt low rise attached dwellings (town houses) from complying with a maximum of three air changes per hour, instead allowing for five air changes per hour. This amendment would permit air leakage from one unit to another decreasing energy efficiency and potentially affecting air quality.	This change was prompted by a concern for the industry to be able to meet the model code threshold. This requirement will be reevaluated during the next cycle.	None

		Duct Sealing and Leakage (R403.2.2 Sealing (Mandatory) This section of the code requires that duct leakage not exceed four cfm per 100 square feet of conditioned floor area. The proposed amendment allows for eight cfm of duct leakage per 100 square feet for both post construction and rough in. This change makes this section of the code equal (outside leakage) or just slightly better than the 2009 IECC.	This change was prompted by a concern for the industry to be able to meet the model code threshold. This requirement will be reevaluated during the next cycle.	None
15	Nash	Support Adoption	Thank you	None
16	Rees	Support Adoption	Thank you	None
17	Hage	Support Adoption	Thank you	None
18	Roserio	Support Adoption	Thank you	None