

STATE BUILDING CODE INTERPRETATION NO. I-11-06

May 3, 2006

The following is offered in joint response to your request for formal interpretation of the provisions of Sections 29-292-14e and 29-292-15e of the 2005 Connecticut Fire Safety Code (CFSC) and the provisions of the 2003 International Existing Building Code (IEBC) portion of the 2005 State Building Code.

Question 1: Is it the intention of Section 29-292-15e of the CFSC to avoid abatement of fire code violations by performing a level 1 alteration under the IEBC?

Answer 1: No. The IEBC is intended to be utilized as an alternative compliance tool to achieve building and fire code compliance in existing buildings undergoing repair, alteration, addition, relocation or change of occupancy. It is not intended to be utilized to avoid compliance with Part IV of the CFSC. Section 29-292-15e states, in part, that compliance with the IEBC or Chapter 34 of the International Building Code (IBC) shall be deemed in compliance with *this part* of the CFSC (emphasis added). The “this part” referred to is Part III which only applies to that portion of the building upon which work is being done. Compliance with the IEBC or Chapter 34 of the IBC does not equate to compliance with Part IV of the CFSC, which sets forth minimum requirements for existing buildings. Thus, the IEBC cannot be used as a tool to avoid abatement of CFSC violations in existing buildings.

Question 2: According to Section 29-292-14e, when an existing building is undergoing an addition, alteration or partial change of occupancy, must the entire building be brought into compliance with Part III of the CFSC?

Answer 2: No. The intent of the code is that Part III applies only to those portions of the building being altered, added or affected by the addition, or undergoing the change of occupancy. Part IV applies to those portions of the building not effected by the activities regulated by Part III.