

BBRS

Official Interpretation No. 2012_2

Date: January 10, 2012

Subject: 8th Edition Residential Code smoke detector/alarm issue with respect to existing buildings.

Background/Discussion:

Presently there is an apparent contradiction between two sections of the promulgated 8th Residential Code (IRC 2009):

- Section R314.3.1 essentially requires updating of smoke detector systems whenever a building permit is “pulled” (with some exceptions).
- Appendix J (IRC 2009), is titled “EXISTING BUILDINGS AND STRUCTURES”. A MA amendment to AJ102.3 has pulled forward the traditional triggers for existing buildings when a smoke detector system upgrade is required; i.e., when new sleeping rooms are added or created, etc.

QUESTION 1: For the 8th Edition Residential Code, where does one start in ascertaining what code requirements apply to an existing residential buildings undergoing proposed building permissible activity?

ANSWER 1: For existing one- and two-family dwellings and existing low-rise residential townhouses, one must start in the MA 8th Edition One- and Two-Family Dwelling Code, Appendix J, titled: “EXISTING BUILDINGS AND STRUCTURES” which may or may not also send the reader back to the Code for new construction, as applicable.

QUESTION 2: I am pulling a permit to do a small bump out of a kitchen in a single family home. Do I need to update the smoke detector system in the entire home per section R314.3.1 of the International Residential Code 2009?

ANSWER 2: No. Appendix J applies to construction for existing buildings. Further, section AJ102.3 was replaced with a MA amendment which invokes fire protection requirements for certain construction projects, including but not limited to the addition of a sleeping room. These requirements are consistent with the BBRS intent, as recorded in meeting minutes, and previous editions of the building code.