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FPFP interpretation as requested by BBRs on 10th edition 780 CMR Section 4.00 – Section 414.2 Control Areas.

780 CMR Section 414.2 Control Areas

Question: *Can rooms and spaces where chemicals are not directly stored, used, and/or handled be permitted to be included within a given control area's boundaries?*

Code Section:

780 CMR 4.00, Section 414.2

“Control areas. Control areas shall comply with Sections 414.2.1 through 414.2.5 and the International Fire Code.

Exception: Laboratory suites in accordance with Section 428 and 527 CMR 1.00 Chapter 26.”

Response:

Yes, rooms and spaces where chemicals are not directly stored, used, and/or handled are permitted to be included within a given control area's boundary. A single control area may be comprised of a specific room, multiple rooms, a floor, or in some instances even an entire building, which is outlined in 2024 International Building Code Commentary (See Commentary published by the International Code Council for this language). Specific scenarios may occur where fire rated separations would be required between spaces containing chemicals and adjacent non-chemical spaces, such as where an atrium borders a control area containing chemicals. In such instances, the fire-separation required for separating control areas from other portions of the building may create a zone within the building, which is not part of any control area, and therefore in this case is not permitted to contain any quantity of hazardous materials, whether in use or storage. The decision of the number of and locations of hazardous material control area(s) in a building or portion of the building, within the code requirements and allowances of 780 CMR, are at the discretion of the designer selected approach.



Figure 2 submitted to the BBRS below would be an acceptable code approach, if the designer selected this approach, assuming the amount of chemicals are within exempt quantities of Table 307.1(1) and Tables 307.1(2) in Control Area 1:

Figure 1

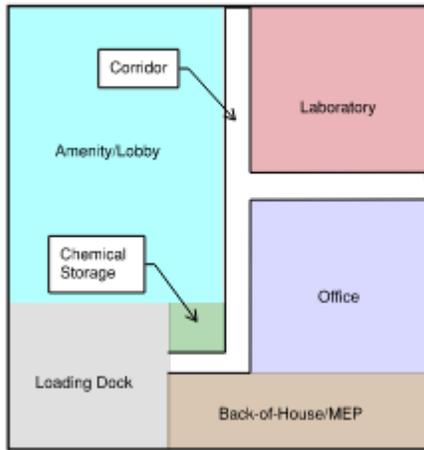
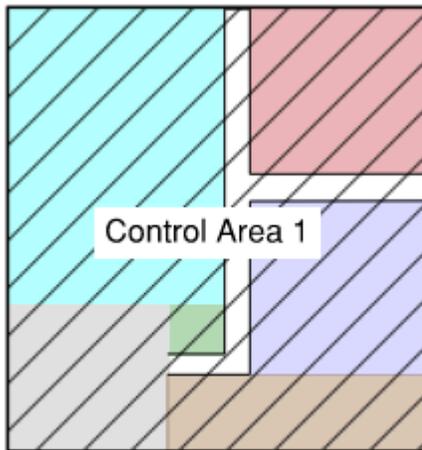


Figure 2



 Control Area boundaries