



*The Commonwealth of Massachusetts
Executive Office of Public Safety and Security
Department of Fire Services*



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STEPHEN D. COAN
STATE FIRE MARSHAL

Memorandum

To: Heads of Fire Department
From: Stephen D. Coan
State Fire Marshal
Date: February 1, 2012
RE: BBRS Interpretation

The Board of Building Regulations and Standards at their January 10, 2012 meeting issued this interpretation regarding smoke detectors in one and two family homes. We are passing this information on to you.

If you have any questions please contact the Code Compliance and Enforcement Unit at 978-567-3375 or in Western MA 413-587-3181.

BBRS OFFICIAL INTERPRETATION No. 2012-001

DATE : January 10, 2012

SUBJECT: Smoke, Heat, Carbon Monoxide Detection and Alarm Systems

At a regular meeting of the Board of Building Regulations and Standards held on Tuesday, January 10, 2012, the Board approved the following interpretation of the application of 780 CMR Appendix J, Section AJ102.3 of the Eighth Edition of the State Building Code

Background/Discussion:

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

Virgin IRC 2009 (*DFS Comment – means unammended 2009 IRC*), Section R314.3.1 essentially requires updating of smoke detectors whenever a building permit is “pulled” (with some exceptions).

The 8th Edition Residential Code, Appendix J (IRC 2009), is titled “EXISTING BUILDINGS AND STRUCTURES”. A MA amendment to Section AJ102.3 has brought forward the traditional triggers for existing buildings when smoke detector upgrade is required; for example, when new sleeping rooms are added or created, the building is “gutted”, etc.

DPS/BBRS staff recommended that Appendix J be utilized for the requirements of existing buildings and that an FAQ be issued and an official interpretation issued, in the short run, and if necessary a code correction (i.e., an amendment to R314.3.1 sending the Reader to Appendix J for existing buildings) follows.

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

ANSWER: 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.

**Staff-developed FAQ to Further Support
BBRS Official Interpretation 2012-001**

**8th Edition Residential Code Volume
(Smoke Alarm requirements for Existing Buildings)**

Q. 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?

A. No. Section AJ102.3 of Appendix J, addressing when smoke detector/alarm upgrades are required, is intended to apply to construction for existing buildings / Section R314.3.1 should have been amended to send the Reader to Appendix J, Section AJ102.3 and will be corrected/amended in the near future. 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, the “gutting” of the building, etc. These requirements are consistent with BBRS intent, as recorded in meeting minutes, and previous editions of the building code (also refer to BBRS Official Interpretation, No. 2012-001).