



September 12, 2012

State Building Code Council
1500 Jefferson
Olympia, WA 98504

RE: Proposed edits to 2012 IBC, IRC and IFC regarding CO alarms

Dear Council Members:

The Washington Multi-Family Housing Association (WMFHA) represents owners and operators of small and large multifamily properties in Washington. Our members own or operate more than 600 such multifamily properties and provide housing for more than 110,000 Washington families.

We suggest a few modifications to the proposed regulations so that the provisions of the IRC, IBC and IFC will be consistent with each other to the extent possible. As proposed, this consistency does not exist and we cite the following few examples.

1. R315.4 requires that the CO alarms "shall be listed as complying with UL 2034 and NFPA 720-2009." This requirement to be listed as complying with the NFPA is not set forth in either the IBC or the IFC and should be deleted from the IRC. We do not believe that the NFPA approves devices as does Underwriter Laboratories. R315.4 also repeats language from R315.1 requiring the installation to be done in accordance with the manufacturer's recommendations. We suggest that the requirement for the alarms to listed as complying with UL 2034 be inserted in R315.1 and that R315.4 be deleted entirely.

2. IBC 908.7 and IFC 1103.09 provide that CO alarms shall "be installed and maintained in accordance with NFPA 720-2009 and the manufacturer's instructions." The IRC does not require installation and maintenance of CO alarms in accordance with the NFPA. The IRC only requires compliance with the NFPA for

CO detection systems and not for single station carbon monoxide alarms

(R315.2). We urge that the reference to the NFPA be deleted from both IBC 908.7 and IFC 1103.09. It should be retained in IBC 908.7.1 to be consistent with R315.2.

3. The requirement to maintain single station CO alarms in compliance with NFPA 720-2009 as set forth in Sections 908.7 and 1103.9 is especially problematic. The 2009 edition of NFPA 720 contains a testing component that requires landlords to test CO alarms within one year after installation and every other year thereafter. This testing component has not been carried forward into the 2012 edition of NFPA 720 and we believe it is a mistake to refer specifically to the 2009 edition and require that single station CO alarms be maintained in accordance with that specific edition of the NFPA.

Following is the recommended language for the affected sections.

R315. Carbon Monoxide Alarms. For new construction, an approved carbon monoxide alarm shall be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in dwelling units and on each level of the dwelling. The carbon monoxide alarms shall be listed as complying with UL 2034 and be installed in accordance with the manufacturer's instructions.

R315.4 Alarm Requirements. Delete this section.

908.7 Carbon monoxide alarms. Group I or Group R occupancies shall be provided with single station carbon monoxide alarms installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in dwelling units and on each level of the dwelling. The carbon monoxide alarms shall be listed as complying with UL 2034 and be installed in accordance with the manufacturer's instructions.

1103.9 Carbon Monoxide alarms. Existing Group I or Group R occupancies shall be provided with single station carbon monoxide alarms in accordance with Section 908.7. An inspection will occur when alterations, repairs or additions requiring a permit occur, or when one or more sleeping rooms are added or created. The carbon monoxide alarms shall be listed as complying with UL 2034 and be installed in accordance with the manufacturer's instructions.

We thank you for your consideration of our suggestions. We will be in attendance at the public hearing in Olympia on September 21 to answer any questions that you may have regarding our recommendations.

Sincerely,

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