

WASHINGTON STATE BUILDING CODE COUNCIL
APPLICATION FOR REVIEW OF A PROPOSED STATEWIDE AMENDMENT
TO THE WASHINGTON STATE BUILDING CODE

1. State Building Code to be Amended.

- | | |
|--|--|
| <input checked="" type="checkbox"/> International Building Code | <input type="checkbox"/> Ventilation and Indoor Air Quality Code |
| <input checked="" type="checkbox"/> International Residential Code | <input type="checkbox"/> International Mechanical Code |
| <input type="checkbox"/> ICC ANSI A117.1 Accessibility Code | <input type="checkbox"/> International Fuel Gas Code |
| <input checked="" type="checkbox"/> International Fire Code | <input type="checkbox"/> NFPA 54 National Fuel Gas Code |
| <input type="checkbox"/> Uniform Plumbing Code | <input type="checkbox"/> NFPA 58 Liquefied Petroleum Gas Code |
| <input type="checkbox"/> State Energy Code | |

IBC Sections 907.2.9.3.1	Page 198
IRC Section R315.2	Page 63
IFC Sections 907.2.9.3.1	Page 95

2. Applicant:

Washington Rental Housing Industry Coalition

Signed:

Proponent	Title	Date
-----------	-------	------

3. Contact Person:

Julie Johnson	President, RHA
Address: 529 Warren Ave N. Seattle, WA 98109	
Phone: (206) 905 0611	Fax: (206) 286-9461

RECEIVED

FEB 14 2011

SBCC

4. Proposed Code Amendment (Underline all added words, strike through deleted words) Additional pages may be attached.

Code IBC and IFC _____ Section 907.2.9.3.1 _____ Pages 197 and 95 _____

Amend section to read as follows:

907.2.9.3.1 Existing dwelling units. ~~Existing dwelling units shall be equipped with carbon monoxide alarms by July 1, 2011. Existing dwelling units located in a building containing a fuel-burning appliance or a building which has an attached garage shall be provided with single station carbon monoxide alarms by January 1, 2012. An open parking garage, as defined in the International Building Code, or enclosed parking garage ventilated in accordance with Section 404 of the International Mechanical Code shall not be determined to be an attached garage.~~

Exception: Sleeping units or dwelling units which do not themselves contain a fuel-burning appliance or have an attached garage, but which are located in a building with a fuel-burning appliance or an attached garage, need not be provided with single station carbon monoxide alarms provided that:

1. The sleeping unit or dwelling unit is located more than one story above or below any story which contains a fuel-burning appliance or an attached garage.
2. The sleeping unit or dwelling unit is not connected by duct work or ventilation shafts to any room containing a fuel-burning appliance or to an attached garage; and
3. The building is provided with a common area carbon monoxide alarm system.

Code --- IRC --- Section --- R 315.2 --- Page --- 63

Amend section to read as follows:

R315.2 Existing Dwellings. ~~Existing dwelling units shall be equipped with carbon monoxide alarms by July 1, 2011. Where work requiring a permit occurs in existing dwellings that have attached garages or in existing dwellings within which fuel-fired appliances exist, carbon monoxide alarms shall be provided in accordance with Section R315.1~~

Exception: Owner-occupied detached one-family dwellings legally occupied prior to July 1, 2010.

5. Background: The Washington Rental Housing Industry Coalition would ask for consideration of the above code changes due to the International Code Council's 2012 code recommendations regarding carbon monoxide alarms in existing Group R2 buildings and the requirements in the 2009 IRC regarding installation of carbon monoxide alarms in existing dwellings.

The 2012 IRC and the 2009 IRC, Section R315, require carbon monoxide (CO) alarms for the following:

1. New dwelling units containing fuel-fired appliances.
2. New dwelling units with attached garages.
3. Existing dwelling units where any work, for the building, requiring a permit is performed and the dwelling unit contains a fuel-fired appliance.

4. Existing dwelling units where any work, for the building, requiring a permit is performed and the dwelling unit has an attached garage.

At its meeting in May 2010, the ICC adopted proposed amendment F133 to both the IBC and the IFC. This amendment deals with carbon monoxide alarms in Group R2 buildings and the requirements are substantially different from the current requirements that were previously adopted by the SBCC. A copy of amendment F133 is attached.

Other information

F133-09/10

Committee Action: Approved as Modified

Note: The following analysis was not in the Code Change monograph but was published on the ICC website at <http://www.iccsafe.org/cs/codes/Documents/2009-10cycle/ProposedChanges/Standards-Analysis.pdf>

Analysis: Review of proposed new standards NFPA 720-2009 and UL 2034-2008 indicated that, in the opinion of ICC Staff, the standards did comply with ICC standards criteria.

Modify proposal as follows:

908.7 (IBC [F] 908.7) Carbon monoxide alarms. Group I or R occupancies located in a building containing a fuel-burning appliance or a building which has an attached garage shall be provided with single station carbon monoxide alarms. The carbon monoxide alarms shall be listed as complying with UL 2034 and be installed and maintained in accordance with NFPA 720 and the manufacturer's instructions. An open parking garage, as defined in the *International Building Code*, or enclosed parking garage ventilated in accordance with Section 404 of the *International Mechanical Code* shall not be deemed to be an attached garage.

Exception: Sleeping units or dwelling units which do not themselves contain a fuel-burning appliance or have an attached garage, but which are located in a building with a fuel-burning appliance or an attached garage, need not be provided with single station carbon monoxide alarms provided that:

1. The sleeping unit or dwelling unit is located more than one story above or below any story which contains a fuel-burning appliance or an attached garage;
2. The sleeping unit or dwelling unit is not connected by duct work or ventilation shafts to any room containing a fuel-burning appliance or to an attached garage; and
3. The building is provided with a common area carbon monoxide alarm system.

908.7.1 Carbon monoxide detection systems. Carbon monoxide detection systems, that include carbon monoxide detectors and audible notification appliances, installed and maintained in accordance with this section for carbon monoxide alarms and NFPA 720 shall be permitted. The carbon monoxide detectors shall be listed as complying with UL 2075.

4606.1 Carbon monoxide alarms. Existing Group I or R occupancies located in a building containing a fuel burning appliance or a building which has an attached garage shall be provided with single station carbon monoxide alarms. The carbon monoxide alarms shall be listed as complying with UL 2034 and be installed and maintained in accordance with NFPA 720 and the manufacturer's instructions. An open parking garage, as defined in the *International Building Code*, or enclosed parking garage ventilated in accordance with Section 404 of the *International Mechanical Code* shall not be deemed to be an attached garage.

Exception: Sleeping units or dwelling units which do not themselves contain a fuel-burning appliance or have an attached garage, but which are located in a building with a fuel-burning appliance or an attached garage, need not be provided with single station carbon monoxide alarms provided that:

1. The sleeping units or dwelling unit is located more than one story above or below any story which contains a fuel-burning appliance or an attached garage;
2. The sleeping units or dwelling unit is not connected by duct work or ventilation shafts to any room containing a fuel-burning appliance or to an attached garage; and
3. The building is provided with a common area carbon monoxide alarm system.

(Portions of the proposal not shown remain unchanged.)

Committee Reason: The committee approved the proposal adding CO detectors to the code since having provisions within the IBC and IFC is a better approach than what has been occurring on a state level through the legislative process. This also makes the IBC and IFC consistent with the IRC. The first modification clarifies that ventilated enclosed parking garages were not intended to be considered as an attached garage for the purposes of enforcing this section. The second modification includes the use of CO detectors and associated systems in accordance with UL 2075. Such detectors are allowed by NFPA 720 and the committee felt it was appropriate to recognize both CO alarms and detectors.

Log # _____

(for office use only)

Economic Impact Worksheet
(Required for statewide amendment requests. Attach supporting documentation.)

2. 3. Code References and Title: WAC 51-51-0315 Section R315 Carbon Monoxide Alarms and WAC 51-50-0907 Section 907 Fire Alarm and Detection Systems

4. Proponent: Washington Rental Housing Industry Coalition, Julie Johnson Phone: 206-283-0816 Date: 8-13-2010

Part I ❖ Amendment Benefit:

1. PROBLEM(S) ADDRESSED: The International Code Council is adopting rules regarding carbon monoxide alarms which are different than Washington State Code which was just adopted and which requires carbon monoxide alarms to be installed in all existing Group R2 dwelling units by on July 2011. It is the rental housing industry's understanding the Council tries not to amend the International Code and only does when there is considerable public benefit. The International Code Council's recommendation understands the distinction between safety measures that are essential and those that are meant to avert an extremely remote risk. There is no end to potential mandates in the second category - and when government imposes such costs on businesses, it leaves them with less money to address more pressing needs.

2. PRIMARY REASON FOR AMENDMENT: (check one only)

- Protect public health, safety and welfare
- Mandate from legislation or courts
- Reduce cost, Financial
- Code change
- "Manage risk" for government
- Other

3. TYPE OF BENEFITS PROJECTED: (check all that apply)

- Saves lives/reduces injuries
- Saves energy
- Protects/improves long-term health
- Protects environment
- Reduces construction cost:
 - Over existing code requirement
 - Canceling new code requirement
 - Off-setting new code requirement
- Increases accessibility
- Increases construction alternatives
- Reduces regulation
- Reduces government enforcement cost
- Clarifies/improves existing code
- Protects property loss/damage
- Other In line with IFC

Part II ❖ Amendment Impacts:

TYPES OF CONSTRUCTION: New Construction Remodeling/Tenant Improvement/Repair

COMPLETE TABLE FOR EACH BUILDING TYPE CHECKED (See reverse for instruction on items ^a through ^e)

√	Building Type	Construction ^a 1st Cost		Enforcement ^b		Owner ^c Ongoing		Other		Supporting data attached
		C/S ^d	Degree ^e	C/S ^d	Degree ^e	C/S ^d	Degree ^e	C/S ^d	Degree ^e	
	Residential									✓
X	Single family							+		✓
X	Multi-family							+		✓
	Commercial/Retail									
	Industrial									
	Government/Utilities									
	Other:									

Economic Impact:

Average cost of 4 carbon monoxide detectors currently offered by a large home supply store: \$32 (includes tax). Landlord will need to evaluate which alarm will suit the unit best.

Average cost to install carbon monoxide alarm: \$8 (3 alarms installed per hour at average hourly wage of \$24 including taxes and benefits).

Average cost of two double AA batteries currently offered by a large home supply store: \$3.50

A carbon monoxide detector should be replaced every 5 years. Batteries should be replaced every 6 months. Therefore there will be ongoing costs for landlord.

If only 1 alarm were required in each rental unit, the cost in Washington state to purchase and install a carbon monoxide detector would be approximately \$43.50. If an average of 2 alarms per unit were required, the cost would be \$87.00.

According to the US Census in 2009 there were 2,813,372 housing units in Washington.

Best guess: 1,461,198 of those are rental units. 720,223 multi-family units and 740,975 single-family rentals.

Total cost of putting one carbon monoxide detector into each rental unit in WA state: \$63,562,113

Total cost of putting two carbon monoxide detector into each rental unit in WA state: \$127,124,226

4. OTHER EFFECTS:

Evaluate by number scale 0-3 (0=none, 3=significant)

0 Likelihood for litigation

0 Decrease public cooperation

0 Disadvantage small business

Other _____

5. Evaluate by letter code

(Spec, Custom, Factory, Remodel, Manufact., Other, NA)

M Advantage one industry

Disadvantage one industry

Part III ❖ Comments and Recommendations:

1. Evaluate each by number scale 0-3 (0=none, 3=significant)

Difficulty to Enforce

Cost of not adopting amendment

Costs exceed Benefits

Degree of TAG controversy

C/S Confidence level

2. Evaluate Yes or No (circle one)

Y / N Were alternative solutions considered

Y / N Recommend further benefit/impact analysis

Y Recommend future benefit/impact review