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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2019-02-2014 IBC-903.3.1.1.1

**Building or Fire Safety Law Interpreted**

**675 IAC 13-2.6 2014 Indiana Building Code, Section 903.3.1.1.1 Exempt locations.** Automatic sprinklers shall not be required in the following rooms or areas where such rooms or areas are protected with an approved automatic fire detection system in accordance with Section 907.2 that will respond to visible or invisible particles of combustion. Sprinklers shall not be omitted from any room merely because it is damp, of fire-resistance-rated construction or contains electrical equipment.

4. Elevator equipment rooms and hoistways used exclusively for the operation of elevators and that are separated from the remainder of the building by two (2) hour fire-resistive construction. Penetrations between machine rooms and hoistways necessary for the safe operation of an elevator, and vents required by Section 3004 of this code need not be fire-rated.

**675 IAC 28-1-5 NFPA 13 2010, Section 8.15.5.6** Sprinklers shall be installed at the top and bottom of elevator hoistways where elevators utilize polyurethane-coated steel belts or other similar combustible belt material.

**Issue**

A question has been raised as to which of the seemingly conflicting regulations above apply to elevator hoistways when they contain elevators that utilize polyurethane-coated belts.

**Interpretation of the State Building Commissioner**

When the provisions of the Indiana Building Code require that a building or portion thereof be equipped throughout with an automatic sprinkler system in accordance with IBC Section 903.3.1.1, the exemption from hoistway sprinkler locations provided in exception #4 of the IBC's Section 903.3.1.1.1 applies to all elevator hoistways and equipment rooms that meet the fire-resistive design and construction and detection requirements stated in the exception language, regardless of the type of cable or belt utilized within the hoistway.

**Rationale**

The NFPA 13-2010 Standard (Standard) is considered part of the Indiana Building Code (Code) through adoption by reference. As such, the Code serves as a scoping document for the application of the Standard, describing, and in some cases limiting, the manner in which it is to be applied. Generally speaking, this means in instances of apparent conflict the language of the Code shall supersede that of the Standard. We believe in this instance that the language of the Code is an intentional limitation of the application of the Standard, and not simply an unintended conflict in the two sets of rules. The fact that this limitation is found in amended language, and not in the model code, further reinforces the interpretation that this is an intended curtailment of specific requirements of the Standard.

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