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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2018-04-2014 IBC-603.1

**Building or Fire Safety Law Interpreted**

**675 IAC 13-2.6**, the 2014 Indiana Building Code, Section 603.1 subparagraph 13. Combustible exterior wall coverings, balconies and similar projections and bay or oriel windows in accordance with Chapter 14.

**Interpretation of the State Building Commissioner**

Subparagraph 13 states that subject to the limits and requirements set forth in Chapter 14, combustible exterior wall coverings are permitted on the exteriors of buildings of Types I and II construction. Since Chapter 2 defines "exterior wall coverings" as including a material or **assembly of materials** [emphasis added] applied on the exterior side of exterior walls, combustible material installed as a backing to other exposed finish materials is included within the scope of the definition, and therefore within the scope of the stated 603.1 subparagraph 13.

Many people refer to subparagraph 13 as an "exception", but it is not an exception at all, but simply one of 25 different combustible items that are allowed in buildings of non-combustible construction. Evidence for this reading includes:

1. It makes no logical, grammatical, or syntactical sense to read items 3-25 as exceptions. From the outset, IBC 603.1 states that it will provide a list of what kinds of combustible material installations are **allowed** in non-combustible construction. It follows that with a list of 25 items. For any of those 25 items to be considered an exception, the scoping statement would have read, "combustible materials may be used in non-combustible construction, with the following exceptions.". It is not phrased in that manner. Further, if the listed items are considered exceptions, then none of the items among them may be used, in which case combustible doors and door frames would not be permitted (#6), nor would the necessary blocking for the same (#14), nor would combustible finish flooring (#10), nor would nailing or furring strips (#18), etc. That is clearly not the intent of this section. The intent is to list 25 combustible material installations that are allowed in non-combustible construction. Only the first two of them have their own short list of exceptions.
2. Subparagraph 2 deals specifically with thermal and acoustic insulation materials, saying they can be used under certain circumstances, followed by a list of two genuine exceptions at the bottom of the first column of that page. If items 3 through 25 are to be considered exceptions and not their own subparagraphs, then they must be a continuation of the exceptions to subparagraph 2. The materials discussed in 3 through 25 have nothing to do with thermal or acoustic insulation, however.

It is nothing but a coincidence of enumeration and pagination in the printing of the model code that makes item number 3 at the top of the second column of text appear to be a continuation of the exceptions to subparagraph 2 on insulation. 3-25 are subparagraphs in their own right, listing the variety of combustible materials allowed to be used. Had that column break not occurred following the two exceptions to subparagraph 2 (thermal and acoustic insulation), it would have been obvious to see that subparagraph 3 (foam plastics) has the same level of indentation as subparagraph 2, and not that of exception 2. ICC commentary does not correct the enumeration/indentation error, but a close reading of the commentary text makes it clear that these items are permitted and not excluded.

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