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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2020-01-2012 IPC-419.3

**Building or Fire Safety Law Interpreted**

[675 IAC 16-1.4](#), 2012 Indiana Plumbing Code, Section 419.3 Surrounding material.

**Issue**

Whether semi-gloss epoxy enamel paint is an acceptable material for urinal walls in Class 1 structures under Section 419.3 of the 2012 Indiana Plumbing Code (IPC).

**Interpretation of the State Building Commissioner**

A specific determination as to the acceptability of all semi-gloss epoxy enamel paints cannot be provided due to the variety of performance characteristics found among products in that general group. However, any material that meets the performance criteria of Section 419.3 of the 2012 IPC is acceptable for use in this installation.

**Rationale**

Section 419.3 of the 2012 IPC does not specify a required construction material for finishes of wall surfaces adjacent to urinals. It provides, instead, a set of minimum performance requirements, to wit: wall surfaces "shall be waterproofed with a smooth, readily cleanable, nonabsorbent material." Any material which meets these performance criteria is considered acceptable under the code. Subject to the meeting of these performance characteristics, the selection of the actual finish material is left to the owner.<sup>1</sup> Further, it should be noted that Section 419.3 of the 2012 IPC does not call for specific durability duration characteristics. The code is a set of minimum design and construction standards. The owner is free to exceed them if he or she wishes, but it is not required.

The ability of this office to provide an interpretation of code-compliance for any building material is dependent on several factors: the meeting of specified performance criteria, industry best practices, our experience (if any) with the material, and manufacturers' (or testing agencies') tests, warranties and certifications as to product performance and suitability to purpose. The more product-specific the material request, the more likely an interpretation can be provided. The more generic the request (such as this one, covering all semi-gloss epoxy enamel), the less likely, as performance characteristics and intended application of multiple products can vary within that general group. Some products of this type might be appropriate for this exposure and others not, making a blanket statement of acceptability impossible.

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<sup>1</sup>This flexibility in the selection of materials is reflected in the 2014 Indiana Building Code as well, where Section 1210.2.2 provides similar performance requirements: "smooth, hard, nonabsorbent surface. . .of a type that is not adversely affected by moisture." In selecting and installing a finish material, the requirements of both codes must be met.

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