

---

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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2020-04-2014 IBC-714.3.2

**Building or Fire Safety Law Interpreted**

[675 IAC 13-2.6](#) Indiana Building Code, 2014 Edition, Section 714.3.2 Membrane Penetrations

**Issue**

Do walls or partitions that abut a rated vertical assembly, and in so doing, penetrate that assembly's nearest membrane, require compliance with Section 714.3.2?

**Interpretation of the State Building Commissioner**

No, walls and partitions in the installations described above are not required to comply with the penetration protection requirements of Section 714.3.2.

**Rationale**

It is true that Section 714.3.2 requires membrane penetrations in vertical assemblies to comply with the through-penetration provisions Section 714.3.1 (and therefore the specific protection requirements of subsections 714.3.1.1 and 714.3.1.2). However, the performance standards referenced in those subsections, ASTM E 814 and UL 1479, are designed and intended specifically for firestopping products, such as those employed in the annular spaces around penetrating fixtures, fittings, equipment, pipe, conduit, wire conductors, etc. Firestopping products are not intended for, nor are they appropriately used in, the intersection of walls or partitions with the rated assembly, and as such, their testing, performance, and installation requirements are equally inappropriate and irrelevant to enforcement purposes involving wall intersections. It is our interpretation, therefore, that Section 714.3.2 is intended to apply only to the penetration of membranes by those items for which a firestopping product is appropriate for use, as tested and directed by these ASTM and UL standards.

The intersection of walls and partitions with rated vertical assemblies still requires protection from the passage of flame from concealed areas in one wall to concealed areas in another, but this protection is typically provided in the form of required fireblocking, and not firestopping.

In regard to the UL listing required by the violation order, it is impractical to provide testing and labeling for the nearly infinite combination of possible wall materials and construction methods, though some do exist in UL publications.<sup>1</sup> Whether any published listed designs match the specific detail(s) in the project in question is unknown. However, the code requirements for fireblocking are clear, and it should not be difficult to apply them in the field.

---

<sup>1</sup> A typical example of appropriate fireblocking in a wall intersection design can be seen in UL Design No. U305.

*Posted: 02/26/2020 by Legislative Services Agency*

An [html](#) version of this document.