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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2020-05-2014 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.

[675 IAC 28-1-5](#) NFPA 13-2010, Section 8.15.10.3

**Issue**

Does the 2014 Indiana Building Code Section 903.3.1.1.1 prohibit the omission of sprinklers in an electrical equipment space that meets the requirements for sprinkler exemption provided in NFPA 13-2010 Section 8.15.10.3?

**Interpretation of the State Building Commissioner**

Section 903.3.1.1.1 of the 2014 Indiana Building Code does *not* prohibit the omission of sprinklers in all electrical equipment rooms. Sprinklers may be omitted from an electrical equipment room if the space meets all four criteria stated in NFPA 13-2010 Section 8.15.10.3.

**Rationale**

The NFPA 13-2010 Standard (Standard) is considered part of the 2014 Indiana Building Code (Code) through adoption by reference. As such, the Code serves as the scoping document for the application of the Standard. In doing so, the Code typically provides the *general* information about how the Standard's *specific* details are applied. Both documents must be examined closely, with an eye toward how the two are designed to work in tandem on this, or any given issue.

The applicable portion of the Code section in question states:

*Sprinklers shall not be omitted from any room merely because it is damp, of fire-resistance-rated construction or contains electrical equipment.*

The Standard states:

*Sprinklers shall not be required in electrical equipment rooms where all of the following conditions are met:*

- (1) The room is dedicated to electrical equipment only.*
- (2) Only dry-type electrical equipment is used.*
- (3) Equipment is installed in a 2-hour fire-rated enclosure including protection for penetrations.*
- (4) No combustible storage is permitted to be stored in the room.*

The wording of the Code section is extremely important here. By utilizing the word "merely", the Code is saying that these conditions – dampness, fire-rated enclosure, or presence of electrical equipment – cannot be the *only* justification for omitting sprinklers.

Put another way, the language of 903.3.1.1.1 is *not* a blanket statement saying sprinklers must be provided in damp spaces, or spaces with electrical equipment, or spaces bound by rated construction. All it says is that those conditions *by themselves* are not a reason to omit sprinklers. Logic then suggests that if one wishes to omit sprinklers from such a space, other qualifying conditions must be present. And those qualifying conditions for electrical equipment rooms are provided in the Standard: 1) it must contain electrical equipment only; 2) that equipment must be of the dry-type; 3) the enclosure must be a minimum of 2-hour fire-resistance-rated construction (including penetration protections); and 4) no combustible materials may be stored in the room. If all four of these criteria are met, then sprinklers may be omitted from the space without being in conflict with the Code.

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

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