FIRE PREVENTION AND BUILDING SAFETY COMMISSION Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2020-20-2104 IBC-T415.5.2

Building or Fire Safety Law Interpreted

675 IAC 13-2.6 2014 Indiana Building Code Table 415.5.2 Detached Building Required

Issue

Whether a building or structure containing a retail consumer grade fireworks (1.4G) store must comply with the requirements for detached structures provided in IBC Table 415.5.2.

Interpretation of the State Building Commissioner

Buildings or structures containing retail consumer grade fireworks (1.4G) are not subject to the detached building requirements of IBC Table 415.5.2.

Rationale

Consumer grade fireworks (1.4G) do not appear in IBC Table 415.5.2, therefore the provisions of the table do not apply to them.

The code itself says in the Chapter 2 definitions that consumer fireworks (1.4G) are eliminated from consideration as explosives for the purposes of applying the code. This is specifically stated in at least two different locations in the definitions: 1) under "Explosives," wherein the code limits included fireworks to display-type (1.3G), and where it adds, "The term 'explosive' includes. . . any material classified as an explosive **other than consumer fireworks**, **1.4G** by the hazardous material regulations of DOTn 49 CFR Parts 100-185;" and 2) under "Fireworks, 1.4G," where it says, "Such 1.4G fireworks. . . are not explosive materials for the purposes of this code".

It is true that Table 415.5.2 includes two individual line items describing the detached building requirements for Division 1.4 explosive materials. It would be an error, however, to assume that removal of 1.4G materials from coverage by the Table would make the 1.4 references meaningless; division 1.4 contains other classes than G. According to the UN Explosive Hazard Classification System and Codes, 1.4 is a division of materials that represent minor explosion hazards. The division is broken into classes, such as 1.4B (blasting caps), 1.4C (model rocket motors), 1.4D (detonation cord), and 1.4S (proximate pyrotechnics and small arms ammunition), all in addition to 1.4G (consumer fireworks). Removal of 1.4G from the explosives in the table, as the code's definitions do, does not mean the 1.4 reference is meaningless – there are other division 1.4 materials still regulated by the table.

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