
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: SBCD-2023-34 [2014 IFC-3206.9.2]

Building or Fire Safety Law Interpreted

675 IAC 22-2.5 2014 Indiana Fire Code Section 3206.9.2 Clear height [High-Piled Combustible Storage].

The required aisle width shall extend from floor to ceiling. Rack structural supports and catwalks are allowed to cross aisles at a minimum height of 6 feet 8 inches (2032 mm) above the finished floor level, provided that such supports do not interfere with fire department hose stream trajectory.

Issue

Whether Section 3206.9.2 of the *2014 Indiana Fire Code* (IFC) prohibits storage above aisles that provide access to exits and fire department access doors.

Interpretation of the State Building Commissioner

No, Section 3206.9.2 of the *2014 IFC* does not prohibit storage above aisles that provide access to exits and fire department access doors – provided the trajectory of fire department hose streams are not interfered with.

Rationale

Section 3206.9.2 of the *2014 IFC* provides for clear height of aisles in structures containing high-piled combustible storage. By virtue of being a subsection of Section 3206.9, the aisles in question are limited to those leading to exits and fire department access doors. Simply put, Section 3206.9.2 requires that the minimum clear width established elsewhere in the chapter for such aisles must be maintained from the floor to the ceiling.

"Ceiling" is not defined by code, though Chapter 10 of the *2014 Indiana Building Code* (IBC) provides for a minimum clear ceiling height of 7 feet 6 inches, with several allowable exceptions. What constitutes the ceiling itself is left to the designer. Section 3206.9.2 of the *2014 IFC* allows two specific types of obstructions to intrude in the aisle's general minimum ceiling height in structures containing high-piled combustible storage: rack structural supports and catwalks, the bottoms of which are allowed to be as low as 6 feet 8 inches above the floor. Apart from these two components, the ceiling must occur at an elevation above the floor that is no lower than 7 feet 6 inches.

It is important to note that simply because Section 3206.9.2 expressly allows two components – rack structural supports and catwalks – to cross these aisles, it does not automatically follow that other items, including storage, are prohibited from doing the same. If the intent of the code was to prohibit the location of stored goods above aisles required for egress or fire department access, it would have been simple to include such a prohibition in the language of the code. Alternatively, it would have been simple to say the required aisle width must be maintained to the underside of the roof structure. The code makes neither of these statements.

Finally, it is equally important to understand that Section 3206.9.2 contains a vital performance requirement in addition to the minimum clear aisle height dimensions. Whatever design is implemented, fire department hose stream trajectory must not be interfered with.

Interpretation Replaces: New

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