
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2020-28-2014 IBC-903.2.9 Condition #4

Building or Fire Safety Law Interpreted

[675 IAC 13-2.6](#), 2014 Indiana Building Code, Section 903.2.9 Group S-1. An *automatic sprinkler system* shall be provided throughout all buildings containing a Group S-1 occupancy where one of the following conditions exist:

[Conditions 1, 2, 3, and 5 omitted for lack of relevance to interpretation request]

4. A Group S-1 *fire area* used for the storage of commercial trucks or buses where the fire area exceeds 5,000 square feet (464 m²).

Issue

Whether Condition #4 of Section 903.2.9 of the 2014 Indiana Building Code (IBC) requires automatic sprinklers in S-1 occupancies with a fire area greater than 5,000 square feet when incidental overnight parking of commercial vehicles occurs in them.

Interpretation of the State Building Commissioner

Condition #4 of IBC 903.2.9 does not require automatic sprinklers in S-1 occupancies with a fire area greater than 5,000 square feet when incidental overnight parking of commercial vehicles occurs in them.

Rationale

The question of whether Condition #4 of IBC Section 903.2.9 applies to any given S-1 occupancy with a fire area of necessary size turns on the matter of primary purpose. When the section discusses required sprinklers under Condition #4, it is in the context of those S-1 fire areas where the primary purpose is the storing of commercial trucks or buses. If the primary purpose of the S-1 fire area is not the storage of commercial vehicles, then Condition #4 does not apply. Incidental overnight parking of vehicles related to the S-1 occupancy does not rise to the threshold of required sprinkler protection, even if the vehicles in question are commercial in nature.

While authorities may have applied this code requirement differently under previous editions of the IBC, requiring sprinkler protection in subject facilities, code adoption records indicate that the commission wished this matter to be treated differently under the 2014 edition of the IBC, in the manner described above. The records of their deliberations even indicated anticipated fiscal impact savings in doing so. This provides substantial indication of their intent in the matter.

This intent is also reflected in the 2014 IBC amended Section 406.1 MOTOR VEHICLE RELATED OCCUPANCIES, which provides an exception stating, "incidental overnight parking of commercial vehicles in S-1, S-2, F-1, F-2 and M occupancies is permitted".

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