

**Written Interpretation of the State Building Commissioner****Interpretation #:** CEB-2020-32-2014 IMC-306.1**Building or Fire Safety Law Interpreted**

**675 IAC 18-1.6**, 2014 Indiana Mechanical Code, Section 306.1 Access for maintenance and replacement. Appliances shall be accessible for inspection, service, repair, and replacement without disabling the function of a fire-resistance-rate assembly or removing permanent construction, other appliances, venting systems, or any other piping or ducts not connected to the *appliance* being inspected, serviced, repaired, or replaced. A level working space at least 30 inches deep and 30 inches wide (762 mm by 762 mm) shall be provided in front of the control side to service an *appliance*.

**Issue**

Whether Section 306.1 of the 2014 Indiana Mechanical Code (IMC) requires the mandatory 30" by 30" level working space be located immediately in front of the control side of the appliance.

**Interpretation of the State Building Commissioner**

Section 306.1 of the 2014 IMC does not require the 30" by 30" level working space to be located immediately in front of the control side of the appliance. However, the working space must be located on the control side, and in a manner that permits equipment access as described in the section's first complete sentence.

**Rationale**

The stated requirements of IMC 306.1, while limited, are clear and for the most part not open to differing interpretations. However, these requirements are also limited in their ability to embrace all possible variants of equipment installation that could be considered to meet these requirements, or that could otherwise affect maintenance access.

This limit is seen most readily in the requirement for the 30" by 30" level working space, which happens to be the one specific requirement of the section that could be said to be subject to interpretation. The code states that this space must be "in front of the control side" of the appliance. There is no discussion of whether the space must be immediately adjacent to, or touching, the equipment. If the furnace is wall-mounted (as it is in the project at the center of this request), must the space be located at the bottom of the equipment, elevated above the floor, or can it be at floor level, with an intervening space under the furnace? If it is acceptable at the floor level, with an empty space between it and the furnace, how high above the floor can the furnace be installed? Can other equipment fill that empty space without detriment to the furnace maintenance process? If so, must that intervening equipment project no farther from the back wall than the furnace itself, so the edge of the working space remains in line with the face plane of the furnace? What if the intervening equipment projects a quarter inch farther out than the face of the furnace? The code does not say the working space must be in line with the equipment, so is moving it a quarter inch farther away from the furnace problematic? If not, at what point farther than that does it become a problem? A work surface located 48" out from the control panel side of the furnace can still be said to be "in front of" the control panel, yet no one would suggest a 48" reach is acceptable, or even possible, for maintenance work. None of these answers are found in the code. The working space must only be in a location that is in front of the controls and which, we may presume, allows access to them.

Because of all these possibilities, none of which are discussed specifically in the text of the code, the question must be viewed from the perspective of intent, and the installation must be observed in the field to determine whether it meets that intent. Can inspection, service, repair, or replacement take place without (a) disabling rated construction; (b) removal of permanent construction; and (c) removal of other equipment; and while (d) providing a 30" by 30" level work space that is placed in front of the equipment controls, located such that the required maintenance activities are not hampered by that working space's location relative to the equipment being serviced, or to other intervening equipment? If the installation is judged by the building official to meet those criteria, it is in compliance. Conversely, to be judged noncompliant, at least one of those conditions must be demonstrably unmet.

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