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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2020-27-2020 IRC-M1308.2

**Building or Fire Safety Law Interpreted**

[675 IAC 14-4.4](#), 2020 Indiana Residential Code, Section M1308.2 Protection against physical damage.

**Issue**

Whether Section M1308.2 applies to galvanized steel ductwork.

**Interpretation of the State Building Commissioner**

No. Section M1308.2 applies to mechanical system piping. It does not apply to ductwork.

**Rationale**

Section M1308.2 of the 2020 Indiana Residential Code states, "Where piping will be concealed within light-framed construction assemblies, the piping shall be protected against penetration by fasteners in accordance with Sections M1308.2.1 through M1308.2.3. Exception: Cast-iron piping and galvanized steel piping shall not be required to be protected." The subsequent subsections discuss circumstances and methods of protection and the materials used therefor, but in all cases, it is in the sole context of pipe and piping.

Although this requirement appears in Chapter 13, one of the mechanical system chapters of the code, its intent is to provide protection for piping. Ducts are not considered piping, but tubes or conduits for the purpose of conveying air, and they are not mentioned in M1308.2. ICC commentary states the section's intent is to protect refrigerant piping and other mechanical system piping from penetration by nails, screws, and other fasteners. Just as the text of the code section does not mention ducts, neither does its commentary. This limited intent is reinforced by the commentary on the exception as well, which it says exists because "cast-iron and galvanized steel pipe have wall thicknesses greater than the required thickness of the shield plate, which makes them inherently resistant to nail and screw penetration." Since galvanized duct material is typically approximately one-tenth as thick as the wall thickness of most galvanized pipe, it is clear that ducts were not considered during the writing of the exception as well.

It is important to note that despite the fact that this section is not applicable to ducts, there are other code requirements for added protection/reinforcement plates where concealed building components penetrate or interrupt framing members, and they can be relevant to duct installations. They should be consulted for their specific applicability.

*Posted: 08/12/2020 by Legislative Services Agency*

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