INTERPRETIVE MEMORANDUM 2007 - 01

To: Licensed Architects
    Licensed Engineers
    Licensed Sprinkler Contractors
    Felicia Cooper, Deputy State Fire Marshal Administrator
    Stephen Gogreve, Manager of Inspections
    Pat Aronstein, Manager of Inspections
    Gail Lorio, Supervisor of Health Care Inspections
    Plan Review Staff

From: Don Zeringue, Chief Architect

Date: March 7, 2007

RE: Sprinkler Protection for Exterior Roofs, Canopies, or Porte Cochere

Please note the following excerpt from NFPA 13, 2002 edition:

8.14.1.2.10 Concealed spaces where rigid materials are used and the exposed surfaces have a flame spread rating of 25 or less and the materials have been demonstrated not to propagate fire in the form in which they are installed shall not require sprinkler protection.

Please note the following excerpts from NFPA 13, 2007 edition:

8.15.1.2.10 Concealed spaces where rigid materials are used and the exposed surfaces have a flame spread index of 25 or less, and the materials have been demonstrated not to propagate fire when tested in accordance with NFPA 255, Standard Method of Test of Surface Burning Characteristics, extended for an additional 20 minutes in the form in which they are installed, shall not require sprinkler protection.

8.15.7.3 Sprinklers shall be permitted to be omitted from below the canopy, roof or porte cochere of combustible construction, provided the exposed finish material on the roof, canopy or porte cochere is noncombustible, limited combustible or fire retardant treated wood as Defined in NFPA 703 and the roof, canopy or porte cochere contains only sprinklered, concealed spaces or any of the following unsprinklered combustible concealed spaces:

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1) Combustible concealed spaces entirely filled with noncombustible insulation.

2) Light or Ordinary hazard occupancies where noncombustible or limited combustible ceilings are directly attached to the bottom of solid wood joists so as to create enclosed joist spaces 160 ft$^3$ or less in volume, including space below insulation that is laid directly on top or within the ceiling joists in an otherwise sprinklered attic.

3) Concealed spaces over isolated small roofs, canopies or porte cocheres not exceeding 55 ft$^2$ in area.

The back-up information from the 2007 edition code writing committee explains that the intent of NFPA 13:8.14.1.2.10, 2002 edition was to never allow brush-on, roll-on or spray-on, field applied coatings over combustible framing lumber, plywood, OSB, etc. to serve as equivalency to fire treated wood.

Therefore, this office shall take guidance from the above referenced sections of NFPA 13, 2007 edition. Brush-on, roll-on or spray-on field applied coatings over combustible framing lumber, plywood, OSB, etc. shall not be an acceptable equivalency to allow omission of sprinkler protection within an exterior canopy, roof or porte cochere concealed space. Also, unless the combustible canopy, roof or porte cochere concealed space meets exception 1, 2 or 3 from NFPA 13:8.15.7.3, 2007 edition, sprinkler protection shall be required to protect floor surface below the combustible canopy, roof or porte cochere.

JCC/jcc