



BOBBY JINDAL
GOVERNOR

DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

Public Safety Services



H. BUTCH BROWNING
STATE FIRE MARSHAL

INTERPRETIVE MEMORANDUM 2011-03

To: LA Licensed Architects
 LA Licensed Engineers
 Felicia Cooper, Deputy Asst Secretary/Plan Review, OSFM
 Chief Dan Wallis, Deputy Asst Fire Marshal Enforcement/Emergency Services, OSFM
 Stephen Gogreve, Manager, OSFM
 Pat Aronstein, Manager, OSFM
 Plan Review Staff, OSFM

From: Don Zeringue, Chief Architect/Plan Review, OSFM

Approved by: Chief Butch Browning, State Fire Marshal

Date: June 10, 2011

Re: **PROTECTION FROM HAZARDS - ROOMS OR SPACES USED FOR THE STORAGE, PROCESSING, OR USE OF COMBUSTIBLE SUPPLIES IN QUANTITIES DEEMED HAZARDOUS**

The requirements contained in NFPA 101 for the protection from hazards vary between the occupancy chapters. **THIS MEMO IS INTENDED TO ESTABLISH A UNIFORM THRESHOLD FOR THE AREA OF A ROOM OR SPACE USED FOR THE STORAGE, PROCESSING, OR USE OF COMBUSTIBLE SUPPLIES FOR OCCUPANCIES IN WHICH THERE IS NO THRESHOLD IDENTIFIED IN THE CODE, OR WHERE “QUANTITIES DEEMED HAZARDOUS BY THE AHJ” ARE NOTED.** Specifically, the following occupancies are addressed by this memo:

Assembly	Educational	Day-Care
Ambulatory Health Care	Apartments	Mercantile
Business	Residential Board and Care- (SMALL facilities)	

It is the determination of this office that protection will not be required for rooms or spaces within the aforementioned occupancies that are 100 square feet or less in area and that are intended to be used for the storage, processing, or use of combustible supplies, and are not used for trash collection. Rooms or spaces that exceed 100 square feet in area shall be protected as specified by NFPA 101 Section 8.7 – “Special Hazard Protection”.

This memo DOES NOT address rooms or spaces that are specifically identified in the code or that are used for purposes other than general storage, such as the processing or use of hazardous materials or flammable or combustible liquids, laundries, janitor closets, etc. These rooms are to be protected as indicated by the appropriate occupancy chapter.

Is Yours Working"??
 Smoke Detectors Save Lives!!
OFFICE OF THE STATE FIRE MARSHAL
8181 INDEPENDENCE BOULEVARD, BATON ROUGE, LA 70806
(225) 925-4911 1-800-256-5452

The following excerpts from the 2009 edition of NFPA 101 contain specific thresholds for protection that ARE NOT addressed by this memo:

Chapter 14 – Educational:

14.3.2.1 Rooms or spaces for the storage, processing, or use of materials shall be protected in accordance with the following:

- (1) Such rooms or spaces shall be separated from the remainder of the building by fire barriers having a minimum 1-hour fire resistance rating or protected by automatic extinguishing systems as specified in Section 8.7 in the following areas:
...
(d) Janitor closets [see also 14.3.2.1(4)]

Chapter 16 – Day-Care:

16.3.2.1 Rooms or spaces for the storage, processing, or use of materials specified in 16.3.2.1(1) through (3) shall be protected in accordance with the following:

- (1) Separation from the remainder of the building by fire barriers having a minimum 1-hour fire resistance rating or protection of such rooms by automatic extinguishing systems as specified in Section 8.7, in the following areas:
...
(d) Janitor closets

Chapter 18 – Health Care:

18.3.2.1 Requires storage rooms larger than 50 square feet but not exceeding 100 square feet and storing combustible materials to be separated by non-fire-rated smoke partitions constructed in accordance with Section 8.4 (see Section 8.7.1.2) with self-closing doors. Storage rooms larger than 100 square feet and storing combustible materials are required to be separated by 1-hour.

Chapter 22 – Detention and Correction:

22.3.2.1 Requires storage rooms larger than 50 square feet but not exceeding 100 square feet and storing combustible materials to be separated by smoke-resistant walls with self-closing doors. Storage rooms larger than 100 square feet and storing combustible materials are required to be separated by 1-hour.

22.3.2.3 Hazardous areas determined by the authority having jurisdiction as not incidental to residents' housing shall be separated by 2-hour fire resistance-rated barriers in conjunction with automatic sprinkler protection.

Chapter 26 – Lodging or Rooming Houses:

26.3.2 Protection from hazard requirements are reserved.

Chapter 28 – Hotels and Dormitories:

28.3.2.2.2 Requires storage rooms larger than 24 square feet and not directly accessible from the guest room or suite to be separated from the remainder of the building by fire barriers having a minimum 1-hour fire resistance rating or sprinkled.

Chapter 32 – Residential Board and Care – LARGE facilities:

32.3.3.2 Requires storage rooms in **LARGE** facilities larger than 50 square feet but not exceeding 100 square feet and storing combustible materials to be enclosed with smoke partitions. Storage rooms larger than 100 square feet and storing combustible materials are required to be separated by 1-hour.

Chapter 40 – Industrial:

40.3.2 Addresses high hazards only, not ordinary.

Chapter 42 – Storage:

42.3.2 No requirements.

NOTE:

This MEMO does **NOT** apply to Health Care, Detention/Correctional, Hotels/Dormitories, Apartment Buildings and Large Residential Board and Care Facilities, as thresholds for storage size are specifically established by code for these occupancies. This MEMO does **NOT** apply to JANITOR CLOSETS in educational and day-care occupancies, since they are specifically identified as hazardous spaces by code, REGARDLESS OF SIZE.