

July 7, 2006

Fact Sheet on 2006 ICC and NFPA Model Code Changes Clarifying Toilet Partitions as Interior Wall Finish

1. What happened?
 - a. The January 2006 ICC publication added Section 802.10 that includes *water closet privacy partitions shall comply with Interior Wall and Ceiling Finish criteria.*
 - b. The 2006 NFPA 101 Life Safety Code added clarification Annexes:
 - i. *A.14.3.3.2, “The definition of Interior Wall or Ceiling Finish is meant to include washroom water closet partitions”.*
 - ii. *A.10.2.1.3 “Such partitions are intended to include washroom water closet partitions”.*
2. What changed?

Water closet privacy partitions (toilet compartments) are now clearly considered as Interior Wall or Ceiling Finish in the ICC and NFPA Model Codes. “Interior Wall or Ceiling Finish” requires an A, B or C classification based on ASTM E84 Test.
3. How are the changes adopted and implemented?

The codes and standards mean nothing and are not enforceable until adopted by a governmental agency such as a city, county, state or federal government. Some agencies adopt new editions very rapidly and others take years. There is no established schedule.
4. How are the changes enforced?

Code enforcement varies from jurisdiction to jurisdiction. An item such as this would often be overlooked unless the code enforcers are educated to look out for it. With regard to fire and building codes, enforcing regulations on existing interior finish is very difficult. For example, how many building managers have the flame spread information on their wall coverings? The answer is very few.
5. Who enforces the changes?

With regard to adopted building codes, these are usually enforced by building officials at the time of construction. It is not typical for a building official to inspect an existing building unless a problem occurs. Fire Marshals typically enforce fire codes.
6. What are the consequences for non-compliance with an adopted code?

Again, this varies from jurisdiction to jurisdiction. In new construction, it could result in a “stop work” order. In enforcement in existing situations, the consequences could range from nothing to shutting the building down.
7. What would this mean to the toilet partition industry?

When the 2006 Model Codes are adopted, unclassified toilet partition materials will not be in compliance.

8. What would this mean to the selection and the specification of toilet partitions?
Before specifying or installing a toilet partition, the interior finish requirements for the occupancy in which the partition is being installed must be checked. The partitions must comply with these requirements. Typically this would be Class B (FSI between 26 and 75 and SDI \leq 450). However, there might be cases where Class A (FSI \leq 25, SDI \leq 450) could be required or Class C (FSI between 76 and 200, SDI \leq 450) would be permitted.
9. What would this mean to the architect?
The architect needs to specify materials that comply with the required Interior Wall or Ceiling Finish Classifications.
10. What would this mean to the building owner/manager decision-maker?
For new construction, this is generally the job of the architect. However in cases of panel replacement, it might fall onto the owner or manager to make sure the proper panels are purchased.
11. What would this mean to the installing distributor?
The distributor could potentially be held accountable for selling partitions without appropriate Interior Wall or Ceiling Finish Classifications. However, this is a legal question, not a code question.
12. What would this mean to Bobrick?
All Bobrick toilet partitions have a Class A or B Interior Wall or Ceiling Finish Classification.
13. What do we do and when?
The material is in both the 2006 ICC and NFPA Model Codes now. It is just a matter of if and when various governmental agencies adopt the 2006 editions of the codes.
14. What do you say and when?
Inform the code officials that there is no longer any question that the panels must have a Interior or Wall Finish Classification, under the 2006 model codes.