

---

---

# BBS MEMO

---

---

Ohio Board of Building Standards

December 17, 1999

6606 Tussing Road, P.O. Box 4009, Reynoldsburg, Ohio 43068-9009

## OBBC 1017.4.1.2 Special Locking Arrangements

We have received several questions about the special locking provisions of Chapter 10 of the OBBC from building departments, architects, engineers, and building owners. Specifically, there seems to be some confusion when applying the requirements of section *1017.4.1.2 Special Locking Arrangements* to certain building types. This BBS Memo will describe the history, intent, responsibility, and latitude of the building official when considering these special locking arrangements.

This language was first proposed in a code change proposal to the 1981 BOCA National Building Code. A representative of a security systems firm submitted the petition in 1983 to provide a solution to the common problem in which building departments and fire departments find egress doors locked because of security concerns. It was initially denied approval because it did not prohibit large occupancy load assembly buildings from using this section. The petition was modified and resubmitted in 1984 and was approved with some modification and produced nearly the same language we have today.

Many I-2 occupancies are beginning to use these provisions to solve some of the problems they are experiencing with patients suffering with progressive degenerative diseases that attacks the brain and results in impaired memory, thinking, and behavior (such as Alzheimer's disease). Licensing agencies have rather harsh penalties and fines for the occurrences of elopement (impaired patients leaving facilities unsupervised). These owners have voiced concerns that they are given various interpretations of the provisions of 1017.4.1.2 or are sent to agencies with no jurisdiction.

The following procedure will assist Building Officials in their enforcement of the provisions of 1017.4.1.2 for the installation of new doors and hardware or modification to hardware on existing doors:

1. The certified building department alone has jurisdiction for these modifications. 3781.10(A) of the Revised Code as well as Administrative Code sections 4101:2-1-17 and 4101:2-34 (section 3404.2 OBBC) clearly places the building equipment and systems within the jurisdiction of the certified building department. Licensing requirements that impact the building and its equipment and systems should be addressed by the owner in the plans submitted to the building department. Any licensing inspections or renewals should not require or order building modifications without requiring submission for plans approval, inspections, etc. by the certified building department. Once the building is issued an occupancy permit, it has been deemed to comply with the OBBC.
2. The installation of new doors and hardware or modification to hardware on existing doors do require the submission of documents for plan review, payment of any fees, inspection of the work (probably by the building and electrical inspectors\*), and issuance of an occupancy permit by the building official. This work is not a change of use when part of an existing I-2 structure. The work done, however, does have to conform to the OBBC. Please do not ignore these types of modification; they are neither minor nor insignificant projects but are an attempt to resolve egress issues within the scope of the building code.
3. If the building official is approached in either preliminary discussions or as a result of the plans examination process for permission to extend the latch release delay to thirty seconds from fifteen [described in 1017.4.1.2(5) exception (1)], the building official may approve such an increase in latch time delay. This increase is clearly described in the code text and the code official (this is specifically the Building Official – 4101:2-2 definition of “code official”) is the approving authority. It is reasonable for the Building Official to permit the increase of the unlatch time to 30 seconds if the circumstances require.

\* NOTE: Because these modifications may involve modifications/connection to the suppression, detection, and annunciation systems, this work may need to be done by a licensed installer. While not enforced under the OBBC, the State Fire Marshal does license installers and should be notified if unlicensed, for profit contractors are involved in work requiring a license.