



# Building Standards and Codes

New York State  
Department of State  
Division of Building  
Standards and Codes  
One Commerce Plaza  
99 Washington Avenue, Suite 1160  
Albany, NY 12231-0001  
Phone: (518) 474-4073  
Fax: (518) 474-5788  
www.dos.ny.gov

---

## CODE INTERPRETATION – 2018-02

---

**Date of Interpretation:** September 17, 2018

**Code Effective Date:** October 31, 2017<sup>1</sup>

**Source Documents:** 2015 International Existing Building Code, as amended by the 2017 Uniform Code Supplement<sup>2</sup>

**Question:** A code enforcement official has asked: Does the exception to item 2 of IEBC Section 804.2.2, require the installation of a new water service or distribution piping from the municipal water supply to the floor of a building, in order to meet the design requirements for a fire sprinkler system?

**Interpretation:** No.

The 2015 International Existing Building Code (2015 IEBC) as modified by the 2017 Uniform Code Supplement, regulates *“all matters governing the repairs, alterations, change of occupancy, additions and relocation of existing buildings.”*<sup>3</sup> Pursuant to Section 301.1 of the 2015 IEBC, there are three methods for compliance: prescriptive, work-area, and performance.

Using the “work-area” method, code compliance is achieved by *“complying with the applicable requirements of chapters 5 through 13.”*<sup>4</sup> According to Chapter 5, titled “Classification of Work”, the provisions of Chapter 8 are applicable to work classified as “Alteration-Level 2” and “Alteration-Level 3.”<sup>5</sup> Section 804.2.2 reads as follows:

*In buildings with occupancies in Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2, work areas that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30 shall be provided with automatic sprinkler protection where all of the following conditions occur:*

1. *The work area is required to be provided with automatic sprinkler protection in accordance with the International Building Code as applicable to new construction; and*
2. *The work area exceeds 50 percent of the floor area.*

**Exception:** *If the building does not have sufficient municipal water supply for design of a fire sprinkler system available to the floor without installation of a new fire pump, work areas shall be protected by an automatic smoke detection system throughout all occupiable spaces other than sleeping units or individual dwelling units that activates the occupant notification system in accordance with Sections 907.4, 907.5 and 907.6 of the International Building Code. [Emphasis added]*

---

<sup>1</sup> The “Code Effective Date” for this Code Interpretation is October 31, 2017, which is the effective date of the current version of the New York State Uniform Fire Prevention and Building Code (the Uniform Code). However, the Uniform Code provisions referenced in this Code Interpretation were not changed from the previous version of the Uniform Code, which became effective on October 3, 2016. Therefore, this Code Interpretation applies both to the version of the Uniform Code that became effective on October 3, 2016 and to the version of the Uniform Code that became effective on October 31, 2017.

<sup>2</sup> The 2015 International Existing Building Code (2015 IEBC) and the 2017 Uniform Code Supplement are publications incorporated by reference in 19 NYCRR Part 1227. The 2015 IEBC, as amended by the 2017 Uniform Code Supplement is one volume of the Uniform Code that became effective on October 31, 2017.

<sup>3</sup> See Section 101.2.8 of the 2015 IEBC, as amended by the 2017 Uniform Code Supplement.

<sup>4</sup> See Section 301.1.2 of the 2015 IEBC.

<sup>5</sup> See Sections 504.2 and 505.2 of the 2015 IEBC.

Interpretation


The phrase “the building does not have sufficient municipal water supply for design of a fire sprinkler system available to the floor” refers to the municipal water main typically found at the street, the horizontal service line from the street to the building, and the vertical piping carrying water to the floor. If the existing water main and service piping cannot provide sufficient supply, a new water main, service piping, and vertical piping “to the floor” are **not** required for sprinkler system purposes. Note that the water supply must be available “without installation of a fire pump.” Accordingly, unless sufficient water supply, including pressure and flow, is available to the floor or story, a sprinkler system is **not** required.<sup>6</sup>

Also, the exception refers to a “municipal water supply,” thus necessarily excluding any building where municipal water is not available from the requirement for a sprinkler system. In both instances, “work areas shall be protected with an automatic smoke detection system throughout all occupiable spaces.” The term “work area” is defined in Section 202 of the 2015 IEBC as:

*That portion or portions of a building consisting of all reconfigured spaces as indicated on the construction documents. Work area excludes other portions of the building where incidental work entailed by the intended work must be performed and portions of the building where work not initially intended by the owner is specifically required by this code.*

The provisions of Section 804.2.2 of the 2015 IEBC pertain to automatic sprinkler systems. Other provisions of the Uniform Code address required water service to the building and should be considered separately from Section 804.2.2 of the 2015 IEBC.

This Code Interpretation is issued pursuant to Executive Law §376(4). Pursuant to Executive Law §376(4), subsequent enforcement of the Uniform Code shall be consistent with this Code Interpretation.



**John R. Addario, P.E.**  
**Special Deputy Secretary of State and**  
**Director, Division of Building Standards and Codes**  
**New York State Department of State**

---

<sup>6</sup> The International Code Council issued “IEBC Interpretation No. 12-04” which interpreted similar language from the 2003 edition of the IEBC as not requiring a sprinkler system if a new water service pipe is required to be installed between the municipal water supply and the building. See [https://www2.iccsafe.org/cs/committeeArea/pdf\\_file/EB\\_03\\_12\\_04.pdf](https://www2.iccsafe.org/cs/committeeArea/pdf_file/EB_03_12_04.pdf).