



# Washington State Building Code Council

*Improving the built environment by promoting health, safety and welfare*

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## STATE BUILDING CODE INTERPRETATION NO. 17-13

**CODE:** 2015 International Fire Code  
2015 International Existing Building Code

**SECTION:** **IFC 1104.1 Means of Egress for Existing Buildings**  
**IEBC Section 805 & 905 Means of Egress; Section 1012.4.2 Means of Egress for Change of Use**

**QUESTION:** Regarding the adoption of IFC Section 1104.1, the state amends this section to state there is an exception to meeting the requirements of the building code if a building conforms to the requirements of the building code under which it was constructed, and Section 1030.

What about buildings that were not built to any identifiable code? The original text in the IFC states that the provisions of Section 1104 apply if no building code conformance was required at the time the building was constructed.

Therefore, per the state amendment, is it correct to conclude that for buildings constructed prior to the adoption of building codes (e.g., in the 1920s/1930s), no minimum egress requirements exist? If so, how does this affect occupancy limits, hazardous work environments, etc.?

**ANSWER:** **Yes, the exception to IFC Section 1104.1 applies to buildings constructed prior to the adoption of building codes. The means of egress is considered compliant where the building has operated safely over time. Buildings with Group R-2 and Group R-3 occupancies must meet the emergency escape and rescue provisions of Section 1030. The International Existing Building Code (IEBC) regulates the means of egress in existing buildings undergoing alterations and change of occupancy.**

**Occupancy limits would apply as designated based on the use of the building. Change of occupancy to the highest hazard classification would trigger compliance with Chapter 10 of the building and fire code. Hazardous operations would have to conform to the relevant codes.**

**SUPERSEDES:** None

**REQUESTED BY:** Whatcom County Fire Marshal