

	A	B	C	D	E	F	G	H
2								
3		WAC Section	IFC 2018	IFC 2015	Title or Subject	Rank 1 5	Comments	
4								
5		Chapter 39		Processing and Extraction Facilities			Existing State Amendments - Entire Chapter 38	
6			3901.1	3801.1, 3801.2, 3801.2.1	Scope	1	Biggest change is that the new Chapter 39 encompasses all plant processing, not just marijuana. Recommend deleting the existing Chapter 38 amendment in it's entirety. May want to add in a couple of minor amendments to the new Chapter 39 and/or Chapter 2 definitions. There are a few items not specifically noted in the new chapter, I feel in most cases the base code covers these in other sections of the code, see below for specific cases.	
7			3904.1	3801.2.2, 3801.3	Use of equipment	1	Equivalent statement	
8			3901.2	3801.4	Existing buildings	1	Equivalent statement	
9			3901.3	3801.5	Permits	1	Equivalent statement	
10			3902	3802	Definitions	2	Most if not all are either included in the new code or available in Webster's dictionary, per 201.4. The one exception I see is the word 'Transfilling' that the state amendment had a definition provided previously. The term is used in the new code, Section 3901.1 but is not defined in the new code and is also not in Webster's. Recommend adding this back in as a state amendment to Sections 3902.1 and 202.	
11			3903.1	3803.1	Location	1	Equivalent statement	
12			3904.1	3803.2, 380.2.1, 3803.2.2	General requirements	1	Equivalent statement	
13			3904.2	3803.2.3	Systems and equipment	1	Equivalent statement	
14			105.5	3803.2.4	Change of medium	2	Not found in the new code. FM can use right of revocation or TAG can add back in if deemed important.	
15			3904.3	3803.2.5	Technical report	1	Equivalent statement	
16			3904.3.1	3803.2.5.1	Report content	1	Equivalent statement	
17			104.7.2, 3901.3	3803.2.6	Building analysis	2	Not found in the new code. FM can use 104.7.2 (Technical assistance) or 3901.3 (Permit required) or TAG can add back in if deemed important.	
18			3904.4	3803.2.6.1	Site inspection	1	Equivalent statement	
19			3903.4	3803.2.7	Winterization	1	Equivalent statement	
20			3903.2	3803.3.1	Location	1	Equivalent statement	
21			3903.3	3803.3.1.1	Extraction room	1	Equivalent statement	
22						2	Amendment required panic hardware, self-closer and swing in direction of egress travel. This is similar to an H occupancy, which most of these rooms will not be classified as. Up for TAG discussion, previous requirements won't apply in most cases unless TAG re-inserts it.	
23			Chaper 10	3803.3.2	Egress			
24			Chaper 10	3803.3.2.1	Facility egress	2	Not found in new code, my opinion is that it is not necessary.	
25			IMC Chap 4	3803.3.3	Ventilation	2	Not found in new code, my opinion is that it is not necessary.	
26			5003.8.3	3803.3.4	Control areas	2	Not found in new code, my opinion is that it is not necessary.	
27			3905.1	3803.3.5	Ignition control	1	Equivalent statement	
28			3905.1.5	3803.3.6	Interlocks	1	Equivalent statement	
29			1203	3803.3.7, 3803.3.7.1, 3803.3.7.2	Emergency power	2	Not found in the new code. Emergency power is process specific, may or may not be important depending on the specific equipment and process utilized. TAG discussion warranted. Note: Emergency power systems have moved to Section 1203.	
30			3905.1	3803.3.8	Gas detection	1	Equivalent statement	
31			5307.4	3803.4, 3803.4.1	Carbon dioxide enrichment	1	Equivalent statement	
32			3901.3	3803.4.2	Permits	1	Equivalent statement	
33			5003.5, 5003.6	3803.4.3	Signage	1	Equivalent statement	
34			3903.5	3803.5, 3803.5.1	Flammable liquids	1	Equivalent statement	
35			3903.5	3803.5.2	Location	1	Equivalent statement	