

SFPC Edits Process: A history and guide for application

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Academy



Purpose of this Module

- Describe the SFPC Edits process
- Understand why the BHCD directed this process to occur
- Clear any confusion over effects of edits

Objectives

- Describe the purpose and intent of the SPFC edits
- Describe the scopes of the USBC and SFPC
- Understand legislative & administrative basis for edits
- Explain the overall effects
- Demonstrate how to apply the SFPC using USBC and IFC references

Agenda

- Overview of the SFPC Edit Process
- History of the USBC, SFPC, and Edit Process
 - Legislative Basis
 - Edits Timeline
- Overall Effects, Application and Enforcement
 - USBC References to IFC
 - “Applicable Building Code”
 - Resources for Research and Support



Overview

Applicability of Requirements to New
and Existing Construction



Overview

USBC

- Governs all construction for new and existing buildings



SFPC

- Governs operations and maintenance requirements for existing structures



Overview

- An existing building shall be maintained in accordance with the building code in effect at the time the building was constructed
- This is the “applicable building code”

Overview

- Conditions identified in an older building that may not be in full compliance with today's codes are acceptable because these conditions were okay at the time the building was constructed
- Proper inspection requires knowledge of applicable codes

Overview

- Research begins with the determination of the year the building was built and what it was used for at that time
- Once the year is known, the exact code requirements can be determined by researching the history of Virginia's building codes



History

Legislative Intent of Codes
& Timeline of the Edit Process



Legislative Intent

- **1973** - COV § 36-98 directs DHCD to promulgate USBC, which supersedes all other construction codes
 - Building remains legal through code revisions as long as the building remains as it is at CO
- **1986** - COV § 27-30 through 27-101, adopts the VSFPC as maintenance and operations code for all buildings in the state
 - Lacks authority to require construction in new or existing buildings

§ 27-34.4 Inspection and Review of Plans of Buildings Under Construction

- Part of Virginia Admin. Code adopting the USBC
- Inspection of buildings under construction, review and approval of building plans for enforcement of the USBC shall be the sole responsibility of the appropriate local building departments.
- Upon completion, responsibility for fire safety maintenance and operations shall pass to the local fire marshal or official designated to enforce the SFPC

§ 36-105.1 Inspection and Review of Plans of Buildings Under Construction

- Part of Virginia Admin. Code adopting the SFPC
- Language identical to § 27-34.4
- Buildings under construction = building department's responsibility
- Upon completion, responsibility for fire safety maintenance and operations passes to FM or official enforcing SFPC

§ 36-119.1 Existing Buildings

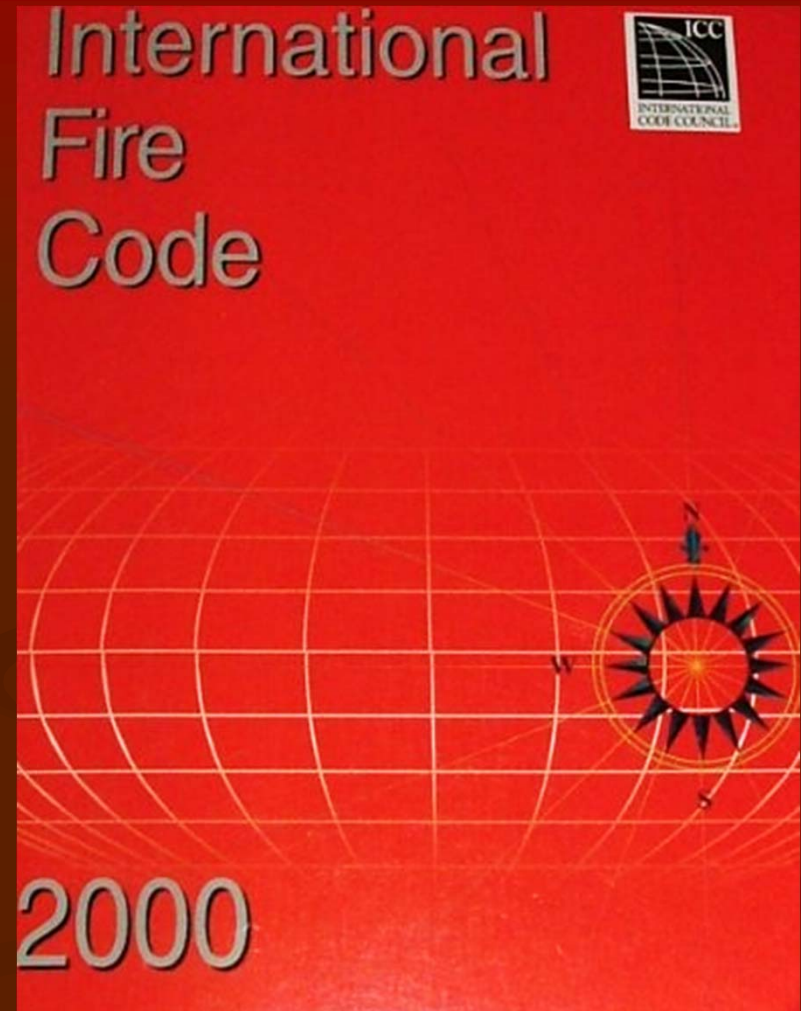
- This chapter shall not supersede provisions of the SFPC for existing buildings, provided those requirements are not more restrictive than the code under which it was built
- Subsequent alteration, enlargement, rehabilitation, repair, or conversion of the occupancy classification of such buildings and structures shall be subject to the construction and rehabilitation provisions of the Building Code

SFPC Evolution Timeline

- 1987 SFPC incorporates by reference the BOCA National Fire Prevention Code as model code
- 2000 BOCA merges with ICBO and SBCCI to form ICC, leading to publishing of 2000 IFC
- 2003 SFPC incorporates 2000 IFC by reference
 - Includes more construction provisions than BOCA NFPC

ICC's International Fire Code

- Structured as a standalone construction, existing building, operations and maintenance code
- 2003 SFPC intended to incorporate only the maintenance and operations provisions of the IFC

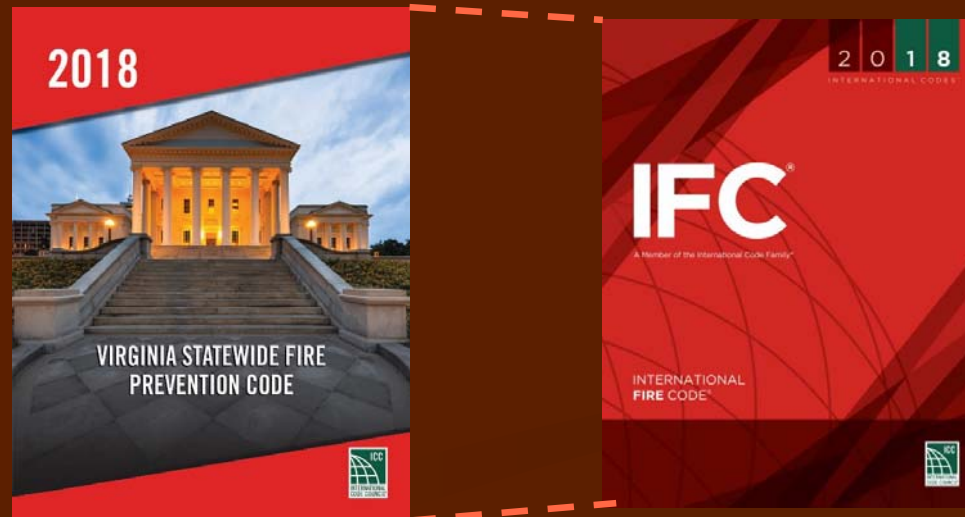


IFC Provisions Overlapping with IBC

- Chapter 7 Fire Resistance Rated Construction
 - Chapter 9 Fire Protection Systems
 - Chapter 10 Means of Egress
 - Chapter 46 Existing Buildings (2009 ed. and later)
-
- COV § 36-98 - USBC supersedes all other construction codes

SFPC 103.1 Incorporations by Reference

- Incorporates the latest IFC by reference
- Deletes IFC chapter 1
- Omits IFC appendices from incorporation



SFPC 103.2 Amendments

- Requirements of referenced codes and standards that relate to the fees, nonoperational permits not specifically required in 107.2, unsafe notices, disputes, condemnation, inspections, scope of enforcement, and all other procedural and administrative matters are deleted and replaced by SFPC Chapter 1

SFPC 103.2.1 Note 1

- IFC and its references contain regulations outside the scope of the SFPC, per BHCD and VA law
- Noted conflicts have been changed to reflect scope of authority
- However in some areas, judgement is required as to whether provision of the IFC are applicable

SFPC Edit Timeline

Intent:

- Remove the sections outside the scope of authority of the SFPC
- Reduce the amount of judgement required by the inspector
- Improve clarity of enforcement

SFPC Edit Timeline

- 2009 Code Change Cycle - BHCD notes confusion in enforcement community around which provisions of the IFC were enforceable
- 2012 Code Change Cycle - BHCD notes need for changes to the SFPC to remove provisions relating to building construction
- 2015 Code Change Cycle - BHCD met with committee of affected client groups to remove unenforceable provisions from the SFPC due to conflicting content in IFC



Overall Effects

Results of the Edits Process
and Application of the SFPC



Key Point

- No technical changes resulted from the edits process
- Any deletions, changes, or additions to provisions are solely for the purposes of clarification

“Maintained in accordance with the applicable building code”

- There are no maintenance provisions in the building code
- Section means “maintained in accordance with the requirements established at the building’s construction”

Example:

- Construction approved by an AHJ under the 2009 VCC is to be maintained per the construction requirements of the 2009 VCC

“Maintained in accordance with the applicable building code”

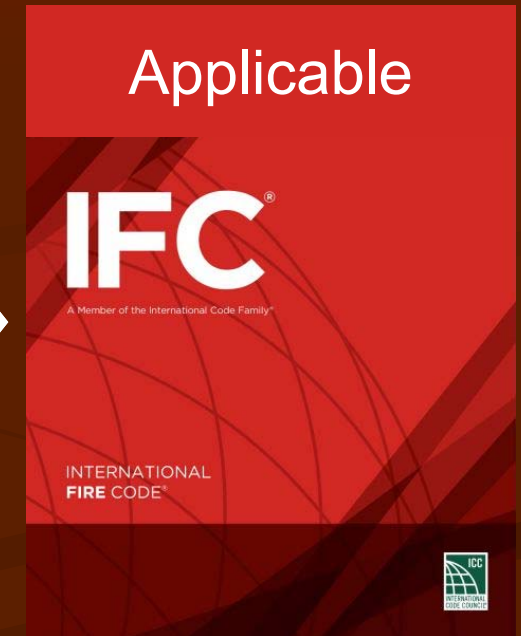
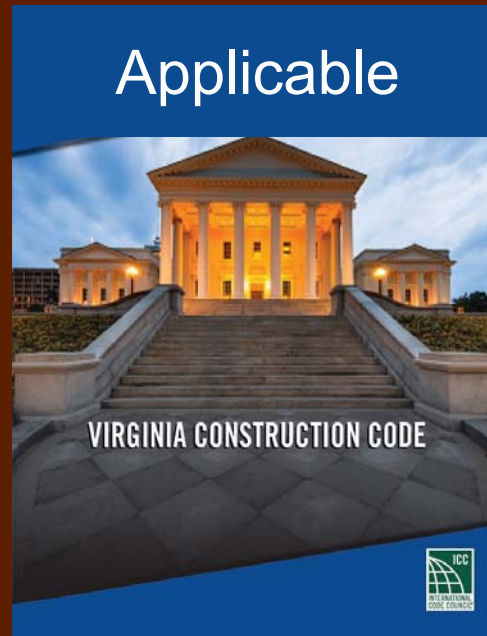
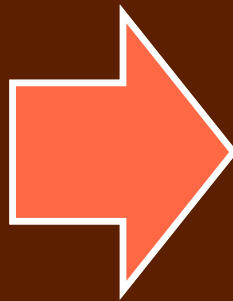
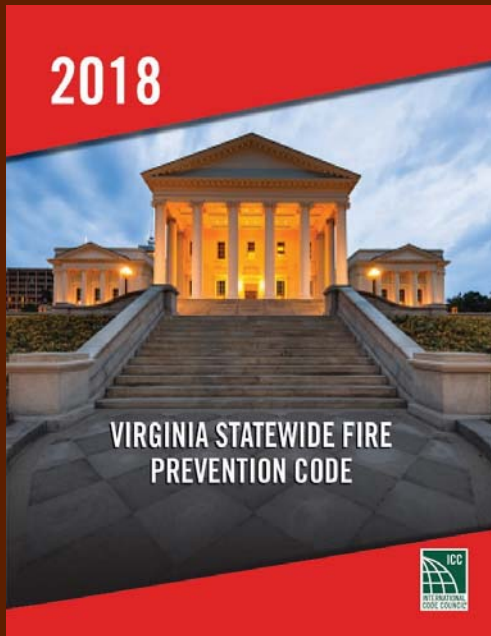
- A building or structure can have layered requirements if work was performed after initial CO

Example:

- Building approved and constructed per the 2009 VCC adds an addition per the 2015 VEBC, using the 2015 VCC
 - Existing unaltered structure to be maintained per 2009 VCC requirements, while the addition is held to the 2015 VCC

VCC references to IFC Mean IFC, Not SFPC

■ SFPC → VCC → IFC

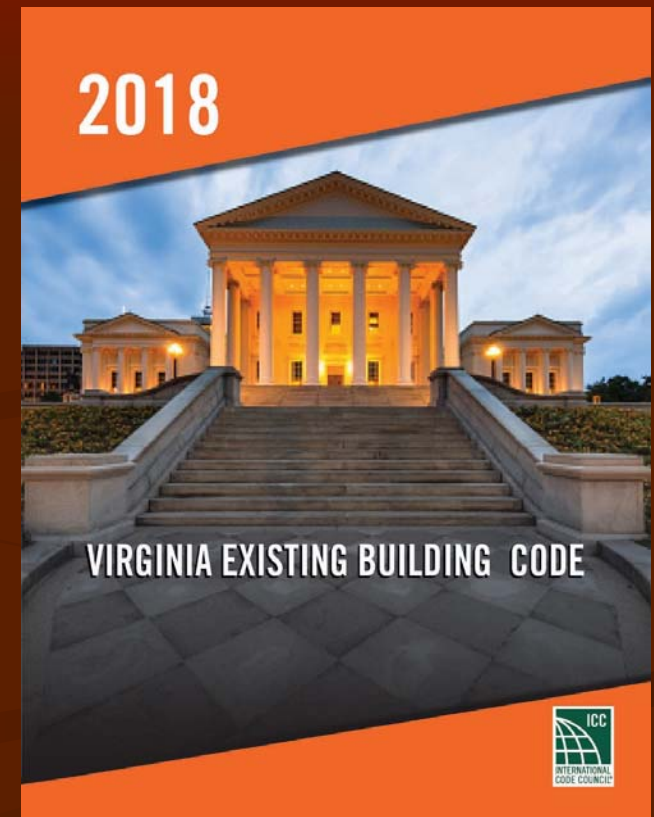


Retrofit Requirements Located in VEBC

- SFPC 102.7 directs reader to VEBC 1101 for required retrofit provisions

Examples:

- Smoke alarms in dorms
- Smoke alarms in adult day care centers
- Address identification
- Signage for Fire Dept Connection



Appendix N

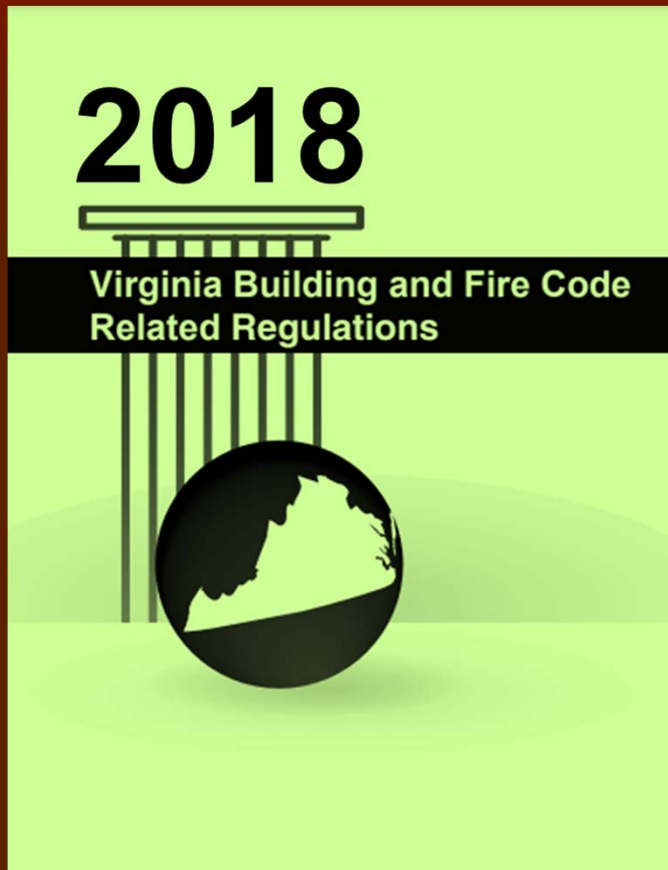
2015 SFPC

- Appendix N includes removed provisions

2018 SFPC

- Eliminates Appendix N due to misapplication of requirements to existing buildings
- Pushes reader to go to the “applicable building code”

Finding Code Effective Dates



- 2018 SFPC, 2018 VMC, and 2018 VEBC now each list code adoption dates back to the 1st edition
- Also located in Related Laws Package

Finding Past Codes

- DHCD provided each jurisdiction with electronic copies of all national codes ever in effect in VA
- Contact DHCD if assistance is needed



Note on Research and Record Keeping

- A building's "applicable building code(s)" should only need to be researched once
- Records should indicate the applicable code for subsequent inspections



Questions?



A close-up photograph of a sprinter in a starting crouch on a red track. The athlete is wearing black shorts, black socks with white stripes, and black running shoes with bright green accents. They are holding a black baton with their right hand, resting it on the track. The track has white lane lines and a blue starting line. The text "Skill Check" is overlaid in the bottom right corner.

Skill Check