

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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1346, IMC #10

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Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

Revise Section 506.3.3 of the 2012 IMC:

506.3.3. Grease duct supports. Grease duct bracing and supports shall be ~~of noncombustible material~~ constructed of carbon steel not less than 16 gage (0.054 in.) (1.37 mm) in thickness or stainless steel not less than 18 gage (0.043 in.) (1.09 mm) in thickness securely attached to the structure and designed to carry gravity and seismic loads within the stress limitations of the *International Building Code*. Bolts, screws, rivets and other mechanical fasteners shall not penetrate duct walls.

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

This proposed change requires grease duct supports to be constructed of steel instead of noncombustible material to be consistent with NFPA Standard 96-2011, which is the industry standard for Type I grease duct systems. It is critical that the code requires steel supports for these systems to maintain structural stability during operation of the exhaust system and especially in the event of a fire, so that fire and smoke do not spread to other parts of the building if the system collapses due to duct support failure.

Proposed Code Change – Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

The proposed change will not change construction/installation costs since it is consistent with the current MR 1346 that adopts NFPA Standard 96 in its entirety.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

Section 506.3.3

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.

No

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.

No.

5. Who are the parties affected or segments of industry affected by this proposed code change?

None.

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

No.

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.

No.