

The Florida Fire Marshals and Inspectors Association, In accordance with FAC 69A-60.011

#### **Informal Interpretation**

**Date:** 7/17/2019

NFPA Document Number: NFPA 101 2015 Edition

Paragraph Reference: 7.1.10.1

Means of egress shall be continuously maintained free of all obstructions or impediments to full instant use in the case of fire or other emergency.

Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above:

We are in disagreement of the code interpretation in NFPA 101 7.2.1.11 Turnstiles and Similar devices. The engineer states that the access gates are not turnstiles, therefore the section should not apply. The Manatee County Fire Marshals group has discussed this we agreed they are not turnstiles however, and we view them as similar devices and they shall meet the criteria outlined in 7.2.1.1.1.3 to be considered for approval.

7.2.1.11.1.3 \*

Security access turnstiles that impede travel in the direction of egress utilizing a physical barrier shall be permitted to be considered as a component of the means of egress, where permitted in Chapters 11 through 43, provided that all the following criteria are met:

- 1. (1)The building is protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7.
- 2. (2)Each security access turnstile lane configuration has a minimum clear passage width of 22 in. (560 mm).
- 3. (3)Any security access turnstile lane configuration providing a clear passage width of less than 32 in. (810 mm) shall be given an egress capacity of 50 persons.
- 4. (4)Any security access turnstile lane configuration providing a clear passage width of 32 in. (810 mm) or more shall be given an egress capacity as calculated in accordance with Section 7.3.
- 5. (5)Each secured physical barrier shall automatically retract or swing to an unobstructed open position in the direction of egress, under each of the following conditions:
  - 1. (a)Upon loss of power to the turnstile or any part of the access control system that secures the physical barrier
  - 2. (b)Upon actuation of a readily accessible and clearly identified manual release device that results in direct interruption of power to each secured physical barrier, remains in the open position for not less than 30 seconds, and is positioned at one of the following locations:

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

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- 1. I. The manual release device is located on the egress side of each security access turnstile lane.
- 2. ii. The manual release device is located at an approved location where it can be actuated by an employee assigned to the area.
- 3. (c)Upon actuation of the building fire-protective signaling system, if provided, and for which the following apply:
  - 1. I. The physical barrier remains in the open position until the fire-protective signaling system is manually reset.
  - 2. ii. The actuation of manual fire alarm boxes that actuate the building fire-protective signaling system is not required to meet the requirements specified in 7.2.1.11.1.3(5)(c)i...
- 4. (d)Upon actuation of the building automatic sprinkler or fire detection system, and for which the physical barrier remains in the open position until the fire-protective signaling system is manually reset.

Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered:

The gates are not Turnstiles and are viewed as similar devices thus the Code reference shall be stand as written.

Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation:

If the gates were to be considered to be installed they would have to meet all of the criteria as outlined above. That is if, Chapter 37 would even allow it to be considered which is clearer than NFPA 101 Chapter 7 prohibiting the proposed access gates.

Explain how the Petitioner's substantial interests are being affected by the question below:

I have safety concerns that the proposed security access gate negatively impacts the life safety egress for the large mercantile business. In the event of a mass egress due to any circumstance (fire related or active shooter) persons would be required to pass through the checkout areas due to the security access gates. Persons would not expect that they would be allowed to exit through the gated area. Do the proposed security access gates do not meet the following code references?

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- **37.2.5.6** In Class A mercantile occupancies, not less than one aisle of a 60 in. (1525 mm) minimum clear width shall lead directly to an exit.
- **37.2.5.7** In mercantile occupancies other than bulk merchandising retail buildings, if the only means of customer entrance is through one exterior wall of the building, one-half of the required egress width from the street floor shall be located in such wall. Means of egress from floors above or below the street floor shall be arranged in accordance with Section <u>7.5</u>.
- **37.2.5.8** Not less than one-half of the required exits shall be located so as to be reached without passing through checkout stands.
- **37.2.5.9** Checkout stands or associated railings or barriers shall not obstruct exits, required aisles, or approaches thereto.

#### Enter the Petitioner's question concerning an interpretation of the FFPC:

Are the proposed security access gates in violation of the following code references noted above?

Committee answer: No

Fire Code Interpretation Committee Answer Submitted by, James Groff, Chairman

Region 1: Vacant

Region 2: Babette Ferris (NR)

Region 3: James Groff (No) Robert Growick (No)

Region 4: Philip Gugliettie (No) Cheryl Edwards (No)

Region 5: Anthony Apfelbeck (No) Tim Ippolito (NR)

Region 6: Robert Salvaggio (No) Kathy Szostak (No)

Region 7: Bryan Park (NR) Janet Washburn (NR)

Region 1 - Delegate: Vacant Alternate: N/A\*

Region 2 - Delegate: Babette Ferris, Tallahassee Fire Department

Alternate: N/A\*

Region 3 - Delegate: James Groff, Jacksonville F. R. (Committee Chair)

Alternate: Robert Growick

Region 4 - Delegate: Philip Gugliettie, St. Petersburg F.R.

Alternate: Cheryl Edwards

Region 5 - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department

Alternate: Tim Ippolito, Casselberry F. R.

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Region 6 - Delegate: Robert Salvaggio

Alternate: Kathy Szostak, City of Naples

Region 7 - Delegate: C. Bryan Park, Broward County Board of Rules & Appeals

Alternate: Janet Washburn, City of Hollywood Fire Rescue

#### **Committee Region Map**

