



DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

Public Safety Services



M. J. "MIKE" FOSTER, JR.  
GOVERNOR

V. J. BELLA  
STATE FIRE MARSHAL

INTERPRETIVE MEMORANDUM 2000 - 4

To: Licensed Architects  
Licensed Engineers  
Mark Gates, Administrator for Inspections/Arson  
Pat Slaughter, Regional Manager of Fire & Safety/Arson  
Stephen Gogreve, Regional Manager of Fire & Safety/Arson  
Pat Day, Supervisor of Health Care Inspections  
Plan Review

From: Jean Carter, Architect Supervisor  
Henry Reed, Architect Supervisor  
Don Zeringue, Architect Supervisor

Approved by: Jerry W. Jones, Deputy Assistant Secretary/Chief Architect

Date: January 19, 2000

Re: Floor Level at Pre-Manufactured Special Use Rooms

Appeal Issue:

The NFPA 101 Life Safety Code requires the floor level on both sides of a door or opening to be at the same elevation and level for a distance at least equal to the widest leaf of a door measured perpendicular to the door or opening. This is intended to reduce the potential for trips and falls due to a change in elevation at the door or opening. This office has received many inquiries and appeal requests concerning the applicability of this requirement to pre-manufactured storage or industrial use rooms. Some examples of these types of rooms and facilities would include coolers/freezers, electrical equipment rooms located at industrial sites, remote instrument enclosures and similar types of spaces. These spaces are areas that are used infrequently by a very few number of employees. The employees who are subject to utilize these spaces or areas have a high degree of familiarity of the space and the doorway/sill condition.

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OFFICE OF STATE FIRE MARSHAL, CODE ENFORCEMENT, AND BUILDING SAFETY

5150 FLORIDA BOULEVARD, BATON ROUGE, LA 70806

(225) 925-4911 1-800-256-5452

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**Code Section:**

101:5-2.1.3...

101:5-2.1.3: The elevation of the floor surfaces on sides of the doorway for a distance at least equal to the width of the widest leaf. Thresholds at doorways shall not be more than ½ in. (13 mm) in height. Raised thresholds and floor level changes more than 1/4 in. at doorways shall be beveled with a slope not steeper than 1 in 2.

*Exception No. 1: In one and two-family dwellings and in existing buildings where the door discharges to the outside or to an exterior balcony or exterior exit access, the floor level outside the door shall be permitted to be one step lower than the inside, but not more than 8 in. (20.3 cm) lower.*

*Exception No. 2: In one- and two-family dwellings and existing buildings, a door at the top of a stair shall be permitted to open directly at a stair provided the door does not swing over the stair and the door serves an area with an occupant load of fewer than 50 persons.*

**Determination:**

Due to the limited number of occupants subject to using the types of areas in question and the occupants familiarity of the facilities and areas in question and conditions at the opening or doorway, it has been determined that this office will allow there to be provided a maximum change of elevation of (9") nine inches in these types of areas or facilities. The two exceptions to 5-2.1.3 allude to this interpretation by recognizing occupants of one and two-family dwellings or existing facilities as being very familiar with their immediate surroundings. The 9" dimension is drawn from Table 28-2.5.6, Equipment Access Dimensional Criteria.

DPZ/kmw

Cc: Marc Reech, Executive Staff Officer Specialist