


BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, EGBC, BOABC

File No: 18-0236

INTERPRETATION

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Interpretation Date:	February 21, 2023
Building Code Edition:	BC Building Code 2018, Book I: General
Subject:	Janitors' Room Fire Separation
Keywords:	Janitors' Room; Storage Limits; Ancillary Use; Incidental Use; Fire Code
Building Code Reference(s):	Division B, 3.3.1.21.(1)
Question(s):	Does a room containing cleaners and cleaning supplies to support cleaning services in a building require a fire-separated room as per 3.3.1.21.(1) in all cases?
Interpretation:	<p>Yes – In most cases.</p> <p>A janitor's room is typically a room used to facilitate cleaning services within a building. Customarily, this room may include facilities such as mop sink or sink, and limited storage. The janitor's room is generally seen to be ancillary to the major occupancy of the floor area, as it may readily be shown that it does not form an integral part of the major use or occupancies of that building.</p> <p>The requirements for the fire separation described in 3.3.1.21.(1) are triggered by the designation of a room or space for the storage of janitorial supplies and does not establish a minimum quantity or specific hazard. This is based on the potential of such space to be used for such storage and the anticipated risk resulting from the accumulation of such materials. The specific permissible contents of such a room are not directly regulated by the Building Code, as these may vary based on the specific day to operational needs of a given building. Some degree of storage is typically permitted, where it is incidental to this use - meaning quantities necessary to facilitate daily or regular use or operations.</p> <p>The foregoing is to be differentiated from janitor's rooms that also contain appliances that support building services. In such cases, these rooms are service rooms and the construction of these rooms should comply with the appropriate requirements of the Building Code. In addition, the Fire Code provides specific guidance on this in Article 2.4.1.1. and its associated notes, which clearly identifies that storage should not generally be provided in these cases.</p>
	 Patrick Shek, P.Eng., CP, FEC, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, EGBC and BOABC, which form the BC Building Code Interpretation Committee. The Building and Safety Standards Branch, Province of BC and the City of Vancouver participate in the committee's proceedings with respect to interpretations of the BC Building Code. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

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Additional Storage Considerations

Large amounts of storage, to a degree where the quantities of such materials and amounts materially change the character of the space, may also be of concern. The precise point at which this becomes a storage room is not clearly identified, but once the quantity of stored materials is out of proportion to the quantities required for regular use, it is appropriate that the provisions for the design and construction of a storage room be applied.

Further to the above, limits on the storage within a room or space in a building may be influenced by other regulations or referenced standards. In a sprinkler protected building, NFPA 13 (and its derivative standards) assume certain amounts of storage within a given space. Where such amounts have, or are likely to be exceeded, then the required sprinkler protection may need to be modified or the room classification changed. Likewise, limits on storage are provided in the Fire Code, focusing on the presence of combustible content and hazardous materials. Lastly, other restrictions may exist based on the specific building design, and owners and designers should exercise some caution on assessing the amounts of storage present.



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