OFFICE OF ENGINEERING SERVICES, REGION X
CODES & INTERPRETATIONS COMMITTEE
REVIEW SUMMARY

REFERENCE: Marty LaRoche, Aberdeen Area IHS, e-mail dated June 23, 1997

ISSUE: Request for clarification of requirement for two exit access doors from dental suite (NFPA 101, 13-6.2.4.2).

LOCATION: Ft. Thompson Health Care Facility, Ft. Thompson, SD

BACKGROUND: Construction on the Ft. Thompson Health Care Facility was completed in 1987. Building construction is classified as Type II (111); the facility is not sprinklered except in the garage area. At the time of construction, the building use was classified as Ambulatory Health Care Center per Indian Health Service (IHS) criteria. The floor assembly between the crawl space and the first floor is 3-1/2-inch concrete over steel decking supported on 14 or 16-inch steel joists 48-inches o.c. and 14-inch deep steel 1-beams. The roof-ceiling assembly is membrane roofing over polystyrene insulation over 5/8-inch water resistant fire rated gypsum wallboard over steel decking supported by 12-inch steel joists 48-inches o.c. and 16-inch deep steel 1-beams and a suspended acoustical tile ceiling assembly 4 to 44-inches below. The ceiling system meets the requirements as a component of a rated ceiling-roof assembly. The interior walls are steel studs with 5/8-inch fire rated gypsum wallboard on both sides. Columns are steel pipe enclosed within interior walls. The walls around the Maintenance and Bulk Stores area extend through the ceiling to the deck above creating a fire separation from the remainder of the building. The effective rating of the fire barrier is assumed to be 30-minute based on door ratings of 20-minute. The Mechanical space internal within this area appears to have a 1-hour fire barrier with 45-minute rated door assembly. The remaining main corridor partitions extend approximately 8-inches above the suspended ceiling. The facility has 4 exterior exit doors: the main entry to the south; one through the Community Health suite to the west; one through the Maintenance area to the west; and one adjacent to the Emergency suite to the east. The Boiler Room and the Bulk Stores also have direct exterior exit doors. Exit signage in the corridors directs traffic to the exit at the main entry or the exit adjacent to the Emergency suite. The Dental suite has one exit access door and is 1,405 square feet. The Ft. Thompson Health Care Facility currently can treat up to 3 patients that may be incapable of self-preservation based on the Emergency suite layout.

DISCUSSION: In the case of an Existing Ambulatory Health Care Center, National Fire Protection Association (NFPA) 101, Life Safety Code (LSC), 13-6.2.4.2 requires any suite of rooms over 1,000 square feet to have at least two exit access doors; ors remotely located from each other. There are no exceptions provided for this requirement.

NFPA 101, LSC, 13-6.2.5 (referencing 5-5 and 27-2.5) requires that exits be arranged so that access is provided to each occupant to at least two exits by separate ways of travel; no dead-end exceeds 50 feet; and no common path of travel exceeds 75 feet.
On April 9, 1997, the IHS Health Facilities Advisory Committee (HFAC) adopted Decision No. D-28, Occupancy Classification. This decision requires that all new and existing IHS designated ambulatory facilities be classified as business occupancy for the purposes of accreditation, unless medical procedures meet the NFPA definition of an ambulatory health care center. NFPA 101, LSC, 13-1.3 defines ambulatory health care centers as those facilities serving 4 or more patients either 1) providing treatment, on an outpatient basis, for patients who are incapable of taking action for self-preservation in the event of an emergency without assistance from others, or 2) providing, on an outpatient basis, surgical treatment requiring general anesthesia.

In the case of an Existing Business Occupancy, NFPA 101, LSC, 27-2.4.2 requires two separate exits from each story and accessible from every part of every story and mezzanine.

NFPA 101, LSC, 27-2.5 (referencing 5-5) requires that exits be arranged so that access is provided to each occupant to at least two exits by separate ways of travel; no dead-end exceeds 50 feet; and no common path of travel exceeds 75 feet.

INTERPRETATION: To be classified as an Existing Ambulatory Health Care Center Occupancy, the facility needs to meet the following minimum requirements:

A second exit access door located remotely from the existing exit access door needs to be provided from the Dental suite either into the corridor or directly to the exterior; and

exit signage in the corridor must be modified to clearly direct occupants to two separate exits from the Dental suite once they enter the corridor, i.e., the main entry and through the Community Health area; from the Radiology suite, i.e., the main entry and adjacent to the Emergency suite; and from Administration suite, i.e., the main entry and through Room 105.

The facility currently appears to meet all the exit requirements of an Existing Business Occupancy except that exit signage does not direct occupants to two separate ways of travel. This deficiency can be corrected by the following:

Exit signage in the corridor must be modified to clearly direct occupants to two separate exits from the Dental suite once they enter the corridor, i.e., the main entry and through the Community Health area; from the Radiology suite, i.e., the main entry and adjacent to the Emergency suite; and from Administration suite, i.e., the main entry and through Room 105.

Based on the current IHS criteria for outpatient facilities, the facility must meet the requirements of an Existing Business Occupancy.
SIGNATURES:

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