

# OSFM INTERPRETATIONS

**NUMBER:** 98-20

**ADOPTION DATE:** February 17, 1998

**REVISION DATE:** November 29, 1999

**TITLE:** Recycling In Group E (Educational) Occupancies: Specifically Classrooms

**RULE or CODE SECTION:** 1994 Oregon Uniform Fire Code, Section 1115

## **CONCERN or ISSUE:**

Does the OUFC apply to recycling in Group E occupancy classrooms?

Does the maximum quantity of paper vary depending on the number of desks in each room? What is the maximum quantity allowed?

Should there be amendments to section 1115 to provide for language more consistent with regards to application and enforcement in occupancies it was intended for?

## **HISTORY or BACKGROUND:**

The requesting party states a concern for how the section applies to classrooms in schools. As stated in the original letter, *“Article 1115.3 will allow each desk within a room to collect a total of 15 gallons of combustibles, in addition to collection and storage for the totals of small, medium, and large rooms. This means a small room is allowed to accumulate 375 gallons (15 gal. per desk @ 25 desks per small room to 500 sq. ft.) plus 55 gallons for a total of 430 gallons. A medium room can have up to 800 gallons, and a large room will be able to accumulate (for the first 75 feet of travel distance) 1,860 gallons of combustible paper.”*

The concern appears to be that excessive quantities of combustibles may result from the presence of too many containers in classrooms. Ultimately, as stated by the requesting person, *“Recycling is important but large fuel loads are not needed in this type of occupancy.”*

## CONCLUSION:

Question #1: Does the OUFC apply to recycling in Group E occupancy classrooms?

Yes. Refer to language specified in section 1115.5(2) where it specifically mentions “classroom”.

Question #2: Does the maximum quantity of paper vary depending on the number of desks in each room? What is the maximum quantity allowed?

In response to the first part of this question, yes. In determining the maximum quantity, the code is intended to apply to classrooms in the following manner: teachers’ desks only may have containers as specified in section 1115.3. As for student desks, containers are not allowed as this would violate the language in section 1115.5(2), which states “...that constitutes a hazard greater than would be expected in a normal....classroom,...” In the case of classrooms, there could be more than a single teacher’s desk and it would be expected that another container could be located next to each desk.

In response to the second part of this question as to determining the maximum quantity allowed, section 1115.3(1) establishes the threshold amounts. In classrooms, this amounts to a maximum of 15 gallons at each *teacher’s* (emphasis by OSFM) desk. Since there could be more than one teacher’s desk in each classroom, then the amount would be multiplied by the number of teacher’s desks in each classroom.

**NOTE:** Some confusion exists whether section 1115.3(2), (3) or (4) applies as well. It is the opinion of the State Fire Marshal that this is inconsistent with the intent of the language in section 1115.1, “commensurate” as well as the previously mentioned language in section 1115.5(2). However, fire officials must look at each situation independently and determine, based on a totality of fire and life safety issues (construction, fire protection features, life risk, other fuel loading, etc.), if additional recycling materials are actually creating an unacceptable hazard which requires correction. In such cases, it would be the intent of the regulation to establish a balance between fire hazard risk management and diversion of recycling of materials which would otherwise end up in the waste system. Use of the exempt amount concept used in other parts of the OUFC **is not** the intent here and should not be used to determine allowed quantities. When fire officials decide that increased quantities of recycling materials can be allowed, it is the recommendation of the State Fire Marshal that section 1115.3 (2), (3), and (4) would provide guidelines for such decisions based on the appropriate room size.

Question #3: Should there be amendments to section 1115 to provide for language more consistent with regards to application and enforcement in occupancies it was intended for?

Since the OUFC is reviewed and updated approximately every three years, amendments to this section would appropriately be handled through the OSFM rules adoption processes. This allows all interested persons or organizations to provide input on how best to make regulations work for all concerned stakeholders. It is the opinion of the State Fire Marshal that if this section of the OUFC is unclear for fire officials or others to interpret and enforce, then those individuals should propose amendments for the next adoption of the OUFC. In this way, the intent can be more clearly specified and potential for consistency in enforcement is more likely.

**NOTE:** The term “Accepted” as it applies to recycling containers in section 1115.4 was specifically discussed both by the person requesting the interpretation as well as by other participants in the interpretation process as part of this question. The use of this term was based on the fact that fire officials are familiar with the term “Approved” and its definition in the OUFC. Until such time as experience or other information indicates unacceptable fire losses, current containers should be considered as acceptable and reasonably safe for public use..

**Approved by:** Robert Panuccio  
State Fire Marshal

**Date:** 11 - 29 - 99