



OREGON FIRE CODE

Interpretations and Technical Advisories

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Date: April 1, 2014

Ruling: Technical Advisory No. 14-11 (Revised TA# 09-02 & TA# 11-13)

Subject: Security of Egress Doors

Code Reference: 2014 Oregon Fire Code (OFC), Section 1008.1.9 and 1030.2

Content: Fire Code Officials are frequently asked about methods that can be used to secure egress doors (typically exit access and exit doors) to maintain building security and prevent unauthorized entry. The OFC has four sections that address this issue directly.

- 1. OFC Section 1008.1.9 Door Operations. Except as specifically permitted by this section egress doors shall be <u>readily openable</u> from the egress side <u>without the use of a key</u> or <u>special knowledge or effort</u>.
- 2. OFC section 1008.1.9.1 Hardware. Door handles, pulls, latches, locks and other operating devices on doors required to be accessible by Chapter 11 ("Accessibility") <u>shall</u> not require tight grasping, tight pinching or twisting of the wrist to operate
- 3. OFC section 1008.1.9.5 Unlatching. The unlatching of any door or leaf *shall not require* more than one operation except as allowed in the following;
 - a. Places of detention or restraint
 - b. Where manually operated bolt locks are permitted by Section 1008.1.9.4
 - c. Doors with automatic flush bolts as permitted by Section 1008.1.9.3, Exception 3
 - d. Doors from individual dwelling units and sleeping units of Group R occupancies as permitted by Section 1008.1.9.3, Exception 4.
- 4. OFC section 1030.2 Reliability. Required exit accesses, exit or exit discharges <u>shall be continuously maintained free from obstructions or impediments to full instant use</u> in the case of fire or other emergency when the building areas served by the means of egress is occupied. An exit or exit passageway shall not be used for any purpose that interferes with a means of egress.

The phrases and words used in these sections are defined (Webster's II New College Dictionary) as follows;

- "readily"; promptly, willingly, easily
- "special"; surpassing the usual, exceptional, peculiar to a specific person or thing
- "knowledge"; familiarity, awareness, or comprehension acquired by experience or study
- "effort"; exertion of physical or mental energy to do something

- "one"; singular
- "continuously"; uninterrupted, constant, nonstop
- "obstructions"; the act of or attempting to impede, clog, block, interfere
- "impediments"; hindrance, obstruction, preventing clear perception
- "instant"; immediate, urgent, imperative, quick and easy

Given these descriptive terms, supported by discussions in the International Fire Code Commentary and the Life Safety Code, clearly indicates that occupants are to be in control of all components in the means of egress. That means that the opening of egress doors is required to be obvious, known, and not hidden. Effort by occupants requiring any unusual or unexpected physical ability to unlock or make the door fully available for egress would therefore be prohibited.

There is language that addresses cases where certain allowances are made for the securing of egress doors.

- OFC section 1008.1.9.3 (Locks and latches) permits locks and latches to prevent operation of doors where any of the following exists;
 - 1. Places of detention or restraint
 - 2. On the main exterior egress door or doors (with key operated locking devices) with three provisions specified;
 - Group A occupancies with an occupant load of 300 or less
 - Groups B, F, M and S occupancies
 - Places of worship
 - 3. Automatic flush bolts where egress doors are used in pairs
 - 4. Night latches, dead bolts or security chains for doors from individual dwelling or sleeping units of Group R occupancies having an occupant load of 10 or less.
 - 5. Fire doors after the minimum elevated temperature has disabled the unlatching mechanism in accordance with listed fire door test procedures.
- OFC section 1008.1.9.4 (Bolt locks) further allows manually operated flush or surface bolts as follows;
 - 1. Doors not required for egress in individual dwelling or sleeping units
 - 2. On the inactive leaf of a pair of doors serving storage or equipment rooms
 - 3. Where a pair of doors serves an occupant load of less than 50 persons in a Group B, F or S occupancy, manually operated edge- or surface-mounted bolts are permitted on the inactive leaf. The inactive leaf shall contain no doorknobs, panic bars or similar operating hardware.
 - 4. Where a pair of doors serves a Group B, F or S occupancy, manually operated edgeor surfaced-mounted bolts are permitted on the inactive leaf provided such inactive leaf is not needed to meet egress width requirements and the building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1. The inactive leaf shall contain no doorknobs, panic bars or similar operating hardware.
 - 5. Where a pair of doors serves patient care rooms in Group I-2 occupancies, self-latching edge or surface-mounted bolts are permitted on the inactive leaf provided that the inactive leaf is not needed to meet egress width requirements and the inactive leaf contains no doorknobs, panic bars or similar operating hardware.

OFC 1008.1.9.6 (Special locking arrangements in Group I-2) and 1008.1.9.7 (Delayed egress locks) specifies their use under specialized circumstances as well as OFC 1008.1.9.12 (Controlled egress locks) which is an Oregon amendment in Group I-2 and Group SR occupancies.

Conclusion:

Given this entire discussion is about unauthorized access, OFC section 1008.1.9.8 (Access-controlled egress doors) has language for certain applications where access into buildings is controlled. It is limited to certain occupancies (Group A, B, E, M, R-1, R-2, and entrance doors to tenant spaces in these same occupancy groups) and has six criteria that must be met in order to comply.

There is no language that supports a requirement for access hardware being installed on the exterior of doors for the purposes of ingress. Many securing of egress door requests involve situations where the egress hardware is old or worn and the door or doors do not have exterior mounted security astragals to prevent ready access to open the hardware from outside of the building. To allow any device that would unnecessarily interfere with the orderly movement of people through egress doors in the event of fire cannot be allowed.

Given that there are numerous methods to prevent unauthorized access into buildings, any hardware proposed or manufactured for the purpose of preventing ingress and at the same time restricting or otherwise prohibiting and/or delaying egress is neither acceptable nor approved under the OFC language as it has been currently adopted.

Other References: 2014 OSSC Section 1008.1.9, 2012 NFPA 101 Life Safety Code Section 7.2.1.5