

**CITY & COUNTY OF DENVER
COMMUNITY PLANNING & DEVELOPMENT
BUILDING PERMIT POLICY**

Subject: EGRESS DOORS – LOCKING AND SECURING

Approved: Michael Roach, P.E., Building Official

**Number: IBC 1008.1.9
IRC R311.2**

**Effective Date: November 3, 2008
Revised: October 14, 2011**

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Reference: IBC 1008.1.9, IRC R311.2

International Building Code (IBC) Section 1008.1.9.5 requires that unlatching of any door or leaf shall not require more than one operation. This does not allow the use of manually operated sliding bolts on any door with other latching mechanisms.

Key-operated locking devices are permitted in buildings in occupancy Group A having an occupant load of 300 or less, Groups B, F M and S, and in places of religious worship, in accordance with IBC Section 1008.1.9.3 Exception 2. The following are clarifications of the locking configurations and devices that may be used under this code section:

- If a pair of doors secured with a key-operated locking device from the egress side, the locking arrangement must be such that one unlocking operation must free both doors.
- If the main exit is made up of multiple doors or multiple pairs of doors, none of these doors can be key-locked from the inside. The reason this is not acceptable is that inside locking of the main exit is allowed because there is assurance that the single door or the single pair of doors will in fact be unlocked when the facility is opened for business. This assurance is lost when we get into multiple doors because only one door could be unlocked in order for the business to operate and the other exit doors – which might remain locked – would not be available for emergency exiting.
- “Thumbturn” door locking devices are not allowed.
- Special doors, Revolving, Power-operated and Horizontal sliding doors, shall not be fitted with a lock or latch that would prevent their operation.

The IBC Section 1008.1 contains the provision that doors provided for egress purposes in numbers greater than required by this code, shall conform to the requirements of that section. This provision is interpreted as follows:

An exterior door that is not a required exit but provides access to the outside for employees (deliveries, shipments, trash, etc.) will not be considered as a door "provided for egress purposes" and therefore will be allowed to be secured or locked in any manner desired by the business owner.

An exterior door that is not a required exit but is in an area normally occupied by the public must comply with all of the provisions for exit doors unless the following conditions are met, in which case, locking is permitted.

- Door must be completely nontransparent and located in a nontransparent wall so that it does not visually suggest egress to the outside.
- Door must be equipped with a sign that reads "THIS DOOR IS NOT AN EXIT."
- All required exit doors must be equipped with code-complying exit signs.

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New Group R Occupancies

IBC Section 1008.1.9.3 Exception 4 prohibits the use of key-operated locking devices on the egress side of doors from individual dwelling units or sleeping units of Group R occupancies

Existing Commercial Buildings

Existing buildings with exit door hardware that was installed prior to October 1990 and that complied with the old Denver Building Code (Section 3303), prior to the incorporation of the Uniform Building Code, and with the joint City policy dated February 1983 will be allowed to remain in place. This criterion was as follows:

1. Any exit door in an office, retail or industrial occupancy could be equipped with one sliding surface bolt mounted above the primary door latch but no more than 6" above the latch. Any door equipped with a sliding surface bolt was required to have a sign that read "THIS DOOR TO BE UNLOCKED DURING BUSINESS HOURS. IF THIS DOOR IS LOCKED DURING BUSINESS HOURS, NOTIFY THE FIRE DEPARTMENT."
2. If an existing exterior door only provides access to the outside for employees (deliveries, shipments, trash, etc.) and is not identified with exit signage, it may be secured or locked in any manner desired by the business owner. If such a door is identified with exit signage, the building owner may apply in writing to the Building Department to review the exiting requirements of the building. If it is determined that the door is not a required exit and the owner's application is approved by both the Building Department and the Fire Department, the exit signage shall be removed and the door may be secured or locked in any manner desired by the business owner.
3. If an existing exterior door is in an area normally occupied by the public and the owner wishes to provide more security on the door than what was allowed by previous policy (Item 1), he may apply in writing to the Building Department to review the exiting requirements of the building. If it is determined that the door is not a required exit, the door must also meet the following conditions before the Building Department and Fire Department can approve additional locking:
 - A. Door must be completely nontransparent and located in a nontransparent wall so that it does not visually suggest egress to the outside.
 - B. Door must be equipped with a sign that reads "THIS DOOR IS NOT AN EXIT."
 - C. All required exits must be equipped with code-complying exit signs.
 - D. A double-keyed lock was permitted on the main entrance door of any commercial occupancy. This was permitted on the theory that this main entrance door would always be unlocked during business hours.
 - E. Other than the circumstances outlined in Subparagraphs 1, 2, 3 and 4, hardware that permitted key locking of exit doors from the inside was prohibited.

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Door hardware that was installed to meet the above criteria will be allowed to remain in place unless the building or tenant space undergoes a change in occupancy or a change in use, or unless new doors or hardware are installed, in which case, the present code for new installations is applicable.

Existing Residential Units

In the past, the City did not apply any restrictions to inside locking of residential exit doors. When the opportunity presents itself, we should point out the hazards of double-keyed bolts and recommend that they be changed to single-key bolts (key lock from outside – thumb turn release from inside).

END OF DOCUMENT