



# DENVER AMENDMENT PROPOSAL FORM FOR PROPOSALS TO THE 2019 DENVER BUILDING CODE AMENDMENTS AND THE 2021 INTERNATIONAL CODES

**DENVER**  
THE MILE HIGH CITY

## 2021 CODE DEVELOPMENT CYCLE

1) **Name:** Brian Lukus **Date:** August 31, 2021  
**Email:** Brian.lukus@denvergov.org **Representing (organization or self):** Organization

2) One proposal per this document is to be provided with clear and concise information.

Is a separate graphic file provided (“X” to answer): \_\_\_ Yes or X No

3) Highlight the code and acronym that applies to the proposal

<u>Acronym</u>	<u>Code Name</u>	<u>Acronym</u>	<u>Code Name</u>
DBC-AP	Denver Building Code–Administrative Provisions	IPC	International Plumbing Code
IBC	International Building Code	IRC	International Residential Code
IECC	International Energy Conservation Code	IFGC	International Fuel Gas Code
IEBC	International Existing Building Code	IMC	International Mechanical Code
<b>IFC</b>	<b>International Fire Code</b>	DGC	Denver Green Code

## AMENDMENT PROPOSAL

Please provide all the following items in your amendment proposal.

**Code Sections/Tables/Figures Proposed for Revision:**

**Instructions:** If the proposal is for a new section, indicate (new), otherwise enter applicable code section.

**Proposal:**

**Instructions:** Show the proposal using ~~strikeout~~, underline format.

Place “X” next to choice that best defines your proposal: \_\_\_ Revision X New Text \_\_\_ Delete/Substitute \_\_\_ Deletion

**Section 904.13.1 Manual system activation is replaced and Exception 2 is added as follows:**

**IFC Code included below for convenience (not part of amendment)**

**904.13.1 Manual system operation.** A manual actuation device shall be located at or near a *means of egress* from the cooking area not less than 10 feet (3048 mm) and not more than 20 feet (6096 mm) from the kitchen exhaust system or at an approved location. The manual actuation device shall be installed not more than 48 inches (1200 mm) nor less than 42 inches (1067 mm) above the floor and shall clearly identify the hazard protected. The manual actuation shall require a maximum force of 40 pounds (178 N) and a maximum movement of 14 inches (356 mm) to actuate the fire suppression system.

~~Exception:~~ Exceptions

1. Automatic sprinkler systems shall not be required to be equipped with manual actuation means.

2. Where placement of the manual actuation device 10 feet or more from the exhaust system would place it outside of the cooking area, the device shall be placed at an *approved* location.

**Supporting Information (Required):**

- Purpose: What does your proposal achieve?

The change will give the fire authority the ability to approve the location of kitchen hood suppression system manual pull station(s) without the need for an administrative modification which is a cost and delay for the project to obtain.

- Reason: Why is your proposal necessary?

New commercial kitchen designs are becoming smaller in area and dimensions such that it is not possible for a manual pull station to be located 10’ away from the cooking appliances and still be within the kitchen. To meet code language as written, pull stations have been located outside of the kitchen, down the hall, etc which is not the best location.

- Substantiation: Why is your proposal valid? (i.e. technical justification)

The location of the pull station should be located where the cook staff sees it daily, so the location is well known and identifiable with little training. If the location is outside of the kitchen due to the 10’ current requirement, the pull station is subject to false pulls (as it could be in a public location) and it may not be in a normal path of travel (although in an exit route) so its location may not be well known. By allowing the fire authority to approve a closer location, the pull station can be located closer and kept at an ideal location within the kitchen. Other supporting considerations are that there is no required minimum distance for the fire extinguisher to be located away from the cook line. Also NFPA 17-5.2.1.10 has no mandated distance and leaves it up to the fire authority to approve its location.

**Bibliography and Access to Materials** (as needed when substantiating material is associated with the amendment proposal):

**Other Regulations Proposed to be Affected**

**\*For proposals to delete content from the 2019 Denver Green Code in conjunction with adding it to other mandatory Denver codes and/or regulations, only.**

Please identify which other mandatory codes or regulations are suggested to be updated (if any) to accept relocated content.

**Referenced Standards:**

List any new referenced standards that are proposed to be referenced in the code.

**Impact:**

How will this proposal impact cost and restrictiveness of code? (“X” answer for each item below)

Cost of construction:    \_\_\_ Increase      X   Decrease    \_\_\_ No Impact  
Cost of design:            \_\_\_ Increase    \_\_\_ Decrease      X   No Impact  
Restrictiveness:         \_\_\_ Increase      X   Decrease    \_\_\_ No Impact

**Departmental Impact (City use only):**

This amendment proposal increases/decreases/is neutral to the cost of plans review.  
This amendment increases/decreases/is neutral to the cost of inspections.