



DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

Public Safety Services



INTERPRETIVE MEMORANDUM 2010-08

To: LA Licensed Architects
LA Licensed Engineers
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Chief Dan Wallis, Deputy Asst Fire Marshal Enforcement/Emergency Services, OSFM
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From: Don Zeringue, Chief Architect/Plan Review, OSFM

Approved by: Chief Butch Browning, State Fire Marshal

Date: December 21, 2010

RE: DEFINITION OF "PARKING GARAGE" vs "PRIVATE GARAGE"
PROTECTION OF "RUBBER TIRE STORAGE"

This document replaces the April 18, 2002 Interpretive Memorandum (IM 2002-04) regarding the definition of parking garages and also replaces the November 14, 2002 Interpretive Memorandum (IM 2002-17) regarding the protection of rubber tire storage.

"PARKING GARAGE" vs "PRIVATE GARAGE"

The International Building Code (IBC) classifies parking garages as either open or closed, and prescribes ventilation and protection accordingly. It is the intent of this office to utilize the provisions of IBC for guidance in defining parking garages and determining the extent of protection needed for life safety.

A building enclosure for automobiles or trucks exceeding 1000 square feet and not meeting the definition of an open parking structure shall be considered an enclosed parking garage and shall be subject to the applicable portions of the NFPA 101 Life Safety Code for Storage Occupancy and shall also be subject to the requirements set forth in NFPA 88A.

A building enclosure for automobiles or trucks NOT exceeding 1000 square feet shall be recognized as a "PRIVATE GARAGE". An area increase to 3000 square feet shall be permitted for "private garages", if no repair work is performed and no fuel is dispensed.

A "PRIVATE GARAGE" shall be reviewed as miscellaneous STORAGE occupancy and shall be subject to associated occupancy requirements for "protection from hazards". The "Parking Structure" Section of

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NFPA 101 shall NOT apply to small incidental parking facilities falling below the defining thresholds set forth in this document for “parking garage” determination.

Covered parking areas not exceeding 3000 sq. ft. that are attached to buildings of other occupancies shall be permitted without separation under ALL of the following conditions:

1. NO vehicle repair work is performed.
2. Parking of buses, trucks and similar vehicles are prohibited.
3. Partial or complete closing of the covered parking area by tarpaulins or any other means is prohibited.
4. NO fuel is dispensed.

“RUBBER TIRE STORAGE”

This document is established in part to define sprinkler scope criteria for the protection of rubber tire storage. The International Building Code (IBC) prescribes automatic sprinkler protection in accordance with NFPA 13 throughout buildings where the area used for the storage of tires exceeds 20,000 cubic feet. It is the intent of this office to utilize the provisions of IBC for guidance in establishing thresholds for the protection of rubber tire storage.

“Repair Garages” are subject to the requirements of NFPA 30A and are recognized as special purpose industrial occupancies for the purposes of NFPA 101 Life Safety Code compliance. Sprinkler protection is prescribed by NFPA 30A for repair garages under specific conditions, regardless of the amount of rubber tire storage. The same prescriptive provisions for sprinkler protection of repair garages are found in the IBC.

In summary, this office determines that a rubber tire storage area exceeding 20,000 cubic feet shall be considered “SEVERE HAZARD CONTENTS” and shall be SEPARATED and PROTECTED in accordance with the provisions for SPECIAL HAZARD PROTECTION prescribed by the NFPA 101 Life Safety Code. In addition, automatic sprinkler protection in accordance with NFPA 13 shall be required throughout buildings containing a “Repair Garage” meeting the applicable criteria set forth in NFPA 30A.

DZ/FLF