



# BBS MEMO

Ohio Board of Building Standards

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6606 Tussing Road, P.O. Box 4009, Reynoldsburg, Ohio 43068-9009

## RCO Section 315

Carbon Monoxide (CO) is a colorless, odorless, toxic gas produced by the incomplete burning of carbon based fuels. Because it cannot be seen, tasted, or smelled, CO can be deadly if not detected. This new section of the Residential Code of Ohio (RCO) was included in the rules effective on January 1<sup>st</sup>, 2013. There had previously been no requirements for carbon monoxide (CO) alarms in the previous edition of the RCO. This new model code language was structured similarly to the smoke alarm language that was included in the previous edition of the RCO in that it contained some requirements that affected areas of the dwelling in which there was no work being done.

In the current edition of the RCO this smoke alarm language was corrected by limiting its impact on other parts of a dwelling in which no work was being done. Unfortunately, there is language in RCO Section 315.2 which may have this same effect; requiring installation of a CO alarm whenever work requiring a "permit" is performed. This was not the intent. Until corrections are made to RCO Section 315.2 as was made to the smoke alarm language, several steps can be taken to correctly implement this section.

The first factor to consider when dealing with the installation of CO alarms is that, if there is no attached garage and no fuel-fire appliance in a dwelling, this language does not trigger a requirement. It would make little sense to require these alarms in dwellings in which the risk of exposure to primary sources of CO production are eliminated; internal combustion engines and fuel-fired appliances.

The next factor to consider is that RCO Section 108.2 does not list the check for the installation of a CO alarm as a required inspection. While it may be inferred to be included under the heading of "other inspections," code language is also clear that "the building official is authorized to make or require other inspections." The building official could, rather, decide to take one of several steps. For example:

- The building official could decide to include a notice on its application for plan approval (RCO Section 107.2), submitted by or on behalf of the owner, that the work being done will lead to a requirement for the installation of a CO detector pursuant to RCO Section 315.1.
- The building official could decide to include a notice on the communication of items of non-compliance to the owner or owner's representative (RCO Section 107.6) that one item of non-compliance includes a requirement for installation of a CO detector pursuant to RCO Section 315.1.
- The building official could decide to include a notice on the certificate of plan approval (RCO Section 107.5.1) that the approval includes a requirement for installation of a CO detector pursuant to RCO Section 315.1.

In making these types of decisions, it is always good practice for building officials to consult with their legal counsel before setting a policy of plan into effect in their jurisdiction.

It would be important, in any case, to notify the owner that if any work being submitted for approval (RCO Section 105.1) includes adding or replacing fuel fire appliances, the requirements of RCO Section 315.2 would be required to be met. This would assure the owner that, in the case of malfunction of the fuel-fired appliance or its related components, there is a simple and inexpensive detection device in place to alert the occupants of the presence of carbon monoxide.