

Objections to Proposed Revisions of the International Mechanical Code (IMC)

by Tom Johnson
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A Call To Action!

The International Code Council held their annual code revision hearings in Cincinnati in late February. Among the proposed revisions was a re-write to the following International Mechanical Code (IMC) section:

507.2.1.1 Operation. Type I hood systems shall be designed and installed to automatically activate the exhaust fan whenever cooking operations occur. The activation of the exhaust fan shall occur through an interlock with the cooking appliances, by means of heat sensors or by means of other approved methods.

The consequence of the above IMC revision is severe and affects every manufacturer of food equipment and commercial exhaust systems. There are several reasons that this proposed revision should be abandoned or significantly revised:

1. The proponents for the rule change did not provide a statement of need and reasonableness (**SONAR**) identifying injury due to current model rules. It is customary when major revisions are proposed to model rules to provide a SONAR document that clearly states the hazard citing examples of injury and a detailed description of how the recommended rule language would mitigate the unsafe circumstance. Without articulating the risk factor there is no measure to the rules value to public health and safety.
2. The proponents of the revision stated that the cost impact for the revision was "none". I am sure that the manufacturers of these new controls and the contractors that install them will feel differently about this.
3. The only justification for the suggested revision was that it makes IMC "consistent with International Fuel Gas Code (IFGC)". Though uniformity and harmony are good, the criterion is a gross extrapolation and does not correlate well with commercial cooking operations. The IFGC is primarily intended to provide minimum protection criteria for automatic, sensor-based systems used to control gas (fuel) fired equipment typical of mechanical systems used to heat water or air for a facility. Commercial cooking operations present significantly different conditions of use. Mechanical systems for buildings run day and night without constant monitoring and manipulation by facility personnel.



Commercial cooking equipment is constantly tended to by cooks that manipulate the food and the food equipments inputs to achieve the desired results.

4. The language of the proposed revision infers that the “cooking equipment” has the interlock. For each manufacturer of cooking equipment to have to modify their equipment with such interface would pose a huge burden to those manufacturers the cost for which would have to be passed on to operators. More troubling would be the field modifications that would be ordered by local AHJ’s compromising the integrity of the cooking equipment manufacturer’s product listing, their warranty and operator safety.
5. This proposed revision would create far more public health and safety problems than it would solve. Sensors will eventually fail meaning the equipment will not work and food will not get cooked leaving operators with one more problem to manage in their already busy facility.
6. This revision is an attempt to regulate the operation of equipment after the certificate of occupancy and consequently cannot be appropriately enforced by the building official. If we were to assume that these criteria were important to public safety, they should be included in a code that is enforced by an agency whose jurisdiction is not tied to the life of the building permit i.e., the fire marshal.

If this revision is accepted and published, all jurisdictions that model their rules after this language will require that the hood must turn itself on whenever cooking occurs, and cooking “appliances” must not operate without the hood also “operating”. Sure sounds like trouble to me...

The deadline for public comment is June 6th so there is time to act by submitting a public comment objecting to the rule articulating its impracticality and its arbitrary nature.

1. Go <http://www.iccsafe.org/cs/codes/publicforms.html> and download a public comment form. Urge ICC to abandon **M60-04/05, revision to IMC 507.2.11** as it creates enormous complexity and incremental costs without any demonstrable benefit to public health and safety.
2. Contact your trade association...tell them to pay attention, that these issue are important to you and your company. Have them contact me or Charlie Souhrada at NAFEM to voice their concern.

Below are some additional links to further information. The first is a pdf of proposed changes; the second is a pdf of an index of committee actions, page 13 of which relates to the “M” codes which stands for mechanical; the third link is the narrative relating to the action.



1. <http://www.iccsafe.org/cs/codes/2004-05cycle/ProposedChanges/IMC.pdf>
2. <http://www.iccsafe.org/cs/codes/2004-05cycle/pdf/ccr2004-05.pdf>
3. <http://www.iccsafe.org/cs/codes/2004-05cycle/2005ROH%7EIMC.pdf>

Additional information can be found at <http://www.jdpinc.com/know.htm>

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