



International Code Council

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RE: Section 402.4.3 of the 2009 *International Energy Conservation Code*

Greetings Max,

This is in reply to our telephone conversation yesterday, during which you posed a question regarding interpretation of the 2009 IECC relative to Section 402.4.3 and the phraseology, "wood-burning fireplaces" having "gasketed doors". Our answer follows:

To be clear, Section 402.4.3 addresses "wood-burning fireplaces," as derived from Code Change EC64-07/08, Part I (**AM**). In the supporting reason to this proposal, the conditions for adding the language were to address indoor air quality matters and concerns for energy savings derived from minimizing air leakage through fireplaces during periods of non-use.

Since certain UL-127 "factory-built" fireplaces are listed and labeled to burn wood, and the installation of gaskets would violate conditions of their listing; we interpret this reference to "wood-burning fireplaces" to mean "masonry fireplaces" constructed in accordance with the *International Building Code*—Section 2111 or *International Residential Code*—Section R1001, and NOT "factory-built" fireplaces manufactured in accordance with the *International Mechanical Code*—Section 903 or IRC—Section R1004. Our rationale is derived from the confusion with respect to requirements for "gasketed doors" and concerns over conditions for product listing.

Worth noting here, is that there are numerous ways to minimize air leakage through fireplaces during periods of non-use without requiring gasketed doors. For example, there are several low emission units considered part of the EPA [Cleaner Burning Fireplace Program](#) which are "tightly sealed," yet do not utilize gasketed doors.

Accordingly, and solely for "factory-built fireplaces," we recommend pursuing relief from the proviso for "gasketed doors" administratively vis-à-vis IECC Sections 101.3 ("...this code is not intended to abridge safety...requirements contained in other applicable codes or ordinances.") and 102.1 ("...provided that such construction [or] design...has been *approved* by the *code official* as meeting the intent of this code.").

We hope this electronic-mail response answers your question in full. The above opinion is based solely on the information which you have provided. We have made no independent effort to verify the accuracy of your submitted information nor have we conducted a review beyond the scope of your question. Remember that only the code official has the authority to interpret the code, and that the opinions of ICC Staff are only advisory.

Thank you for your inquiry,

A handwritten signature in black ink, appearing to read "Darren B. Meyers". The signature is fluid and cursive, with a large initial "D" and "M".

Darren B. Meyers, PE, CEM, GBE
Technical Director – Energy Programs