



South Carolina Building Codes Council

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Request for Statewide Code Modification

Jurisdiction or Organization: <u>BOASC</u>	
Representative: <u>Tony Longino</u>	Title: <u>Chief Mechanical Inspector</u>
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Signature: <u><i>Buddy Skinner</i></u>	Date: <u>5/24/18</u>

Code: International Residential Code Edition: 2018 Section: M1502.4.2

Check One: Delete and substitute the following Delete without substitution Add the following Modify the following
Type or print proposed modification. Use additional pages if necessary. Underline New language. ~~Line Through Deleted Language.~~

M1502.4.2 Duct Installation. Exhaust ducts shall be supported at intervals not to exceed 4 foot intervals 8 feet and within 16 inches of each side of a joint that is not installed in a vertical orientation, secured in place, making ridged contact with the duct at not less than 4 equally spaced points or 2/3rds contact if strap is used. All brackets or strapping must be noncombustible. The insert end of the duct shall extend into the adjoining duct or fitting in the direction of the airflow. The overlap shall comply with Section M1601.4.2. ~~Ducts shall not be joined with screws or similar devices that protrude more than 1/8" into the inside of the duct.~~ Exhaust ducts shall be sealed in accordance with Section M1601.4.1. Where dryer exhaust ducts are enclosed in wall or ceiling cavities, such cavities shall allow the installation without deformation.

Reason: Unusually Restrictive Impractical Threat to Human Injury or Life Safety
Type or print the reason for the proposed modification. Use additional pages if necessary.

Due to the amount of dryer fires in the United States every year, 15,000 according to the US consumer product safety division, I believe the requirement for adding 3 screws per joint to the exhaust vent of clothes dryers to be overly restrictive, impractical and a threat to life safety for the following reasons:

- (1) The requirement is for no more than 1/8" to protrude the inside if the duct, 1/4" sheet metal screws are as short as available, leaving more than 1/8" protrusion inside of the duct. One quarter inch = 0.250 inch - One eighth inch = 0.125. .28 gage metal = 0.0157 inch - times 2 layers equals 0.0314inch - 0.250 minus 0.0314 = 0.2186. Even if you allow for the curvature of the metal 0.2186 will be greater penetration than the 0.125 that is allowed.
- (2) Screw lengths on a dryer vent are not able to be inspected from the outside. This leaves the inspector to have to remove each screw to ensure the length, and the inspector to replace the screws after the fact (if they do not drop one and just leave a hole in the exhaust). Many of the screws are not within the reach of the inspector, leaving them to try to assume all screws are the same length by taking out only the reachable ones. Rivets are worse, due to the fact that they cannot be checked without drilling them out and replacing them on your own, rendering them as completely unable to be inspected.
- (3) The amount of dryer fires in the United States has not been proven to be due to failure of the joints on vents, but has been proven to be due to an accumulation of lint. Adding protrusions of any length into the dryer exhaust will not decrease the possibility of more accumulation. However securing, sealing and supporting each side of the joint of a no vertical exhaust will prevent the separation of joints