



# LODGING ENGINEER – Winter 2013

## Carbon monoxide alarms for hotels – Not so fast!

By Thomas G. Daly MSc. CSP

If your state or local regulators are in the process of adopting either the International Code Council's (ICC) 2012 International Building Code (IBC) or International Fire Code (IFC) or both, you should make them aware of pending changes to these codes relative to the requirements for carbon monoxide (CO) alarms for hotels.

The 2012 editions of the IBC and IFC for the first time require hotels to install carbon monoxide (CO) alarms in all guest rooms or alternately a CO detection system in all common areas.<sup>1</sup> These new requirements not only affect newly constructed hotels (IBC) but existing hotels (IFC) as well. As of October only Wyoming has adopted the 2012 IFC impacting existing hotels but four states, Wyoming, Maryland, Missouri and South Dakota have adopted the 2012 IBC and more states are considering adopting both codes.

In September 2012 a ten-month long study by the ICC's Work Group on CO Alarms was reported to the ICC's Fire Code Action Committee (FCAC) on the flaws in both the 2012 IBC and IFC language. That report suggested major revisions to both codes were needed to more definitively require CO alarms or detectors at the potential source location of CO producing appliances while removing requirements for CO alarms elsewhere where the potential exposure is remote.

The FCAC considered those recommendations at their public meeting in November 2012 and approved them without dissent as an FCAC proposal to be considered by the ICC Membership at their May and October 2013 code change hearings. These changes, if approved, would then appear in the 2015 editions of the IBC and IFC. The Hospitality Security Consulting Group, LLC was a member of the ICC CO Alarm Work Group.

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<sup>1</sup> Sec. 908.7 of the 2012 International Building Code and Sec. 1103.9 of the 2012 International Fire Code.

Boiling down the proposed changes they will require a CO alarm or detector in any room in a hotel which contains a fuel-fired appliance and in some ancillary spaces but nowhere else. For most hotels that would mean a CO alarm or detector would be needed in a mechanical equipment room with a gas-fired boiler, a pool heater room with a gas-fired heater, kitchens with gas-fired stoves and emergency generator rooms with diesel fired generators. Should a hotel have a wood or gas-fired fireplace in the lobby, a CO alarm or detector would be needed there as well. But that's all.

Providing CO alarms in all of those locations would cost less than \$1,000, a far cry from the current code requirements for CO alarms in all guest rooms where there are no fuel-fired appliances typically or throughout all common areas.

In light of these pending changes, to adopt the 2012 editions of either code would impose unwarranted obligations on lodging properties only to have those requirements repealed three years later. The CO alarm installation cost estimate nationwide for the lodging industry under the 2012 codes is more than \$250 million.

In California, where the 2012 IFC language was added to their building code in the Summer of 2011 (effective compliance date January 1,2013 for existing hotels), the legislature and Governor have acted to put the brakes on this requirement for existing hotels until January of 2016 while things get sorted out.<sup>2</sup>

Other jurisdictions should heed California's caution. State hotel associations should take the lead in coming rulemaking processes.

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**Thomas G. Daly, M.A., MSc, CSP** is a Principal and Managing Member of The Hospitality Security Consulting Group, LLC. He is a former member of the NFPA Committee on Carbon Monoxide and previously served as Vice President Loss Prevention for Hilton Hotels Corporation. He is a certified safety professional and holds a master's degree in safety from the University of Southern California.

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<sup>2</sup> See California SB 1394 (2012)

[http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201120120SB1394&search\\_keywords=](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120SB1394&search_keywords=)