



CITY OF SAN ANTONIO
DEVELOPMENT SERVICES AND FIRE DEPARTMENT
PO BOX 839966 SAN ANTONIO TEXAS 78283-3966



TO: Development Services and Fire Department Customers

SUBJECT: **INFORMATION BULLETIN 192a**
Occupancy Classification Letters (a.k.a. “Commodities Letters”) for Storage, Retail, Warehouse, Manufacturing and/or Hazardous Materials

DATE: July 6, 2011/*Revised February 28, 2012/Revised August 1, 2014/Revised February 25, 2016*

CREATED BY: Plan Review Division and Fire Department

I. PURPOSE:

As a customer service initiative, the Development Services Department (DSD) and San Antonio Fire Department (SAFD) have developed this Information Bulletin (IB) to:

1. Identify and explain the City’s code requirements for the submittal of an Occupancy Classification Letter, OCL (a.k.a., “Commodities Letter”), to document a project’s proposed storage of products, manufacturing process and/or handling of hazardous materials, and
2. Provide a standardized format with which to report types of storage and/or use of combustible stock and hazardous materials for the proposed project.

The proper documentation of an owner’s proposed storage of combustible stock and/or storage/handling of hazardous materials via a clear and accurate OCL or other approved Fire Protection report will:

- Expedite the plan review and approval of the proposed project by enabling the City to properly assign the Occupancy Classification for the building or portion thereof.
- Help the customer, design team and City staff quickly identify the minimum building and fire code related systems (e.g., fire barriers, fire protection systems, secondary containment, ventilation, smoke removal, etc.) required for the proposed project and ensure that they are included in the proposed design.

Correct identification and classification of commodities and hazardous materials is critical for safety and proper storage. Incorrect or missing identification and/or classification can result in processing delays, failed inspections, and delays in issuing a Certificate of Occupancy for the business. Hazardous materials and commodities require specialized protection systems aligned to the identification and classification per City building and fire codes and that meet the requirements of the business. It is strongly recommended the services of a fire protection design professional (e.g. TX Registered Fire Protection Engineer) be obtained to assist with correct classification and the design of an appropriate protection system.

II. APPLICABLE CODE SECTIONS:

Per **Section 105.4.2.2** of the City’s adopted amendments to the 2015 International Fire Code (IFC), two (2) copies of a completed OCL or other approved Fire Protection report shall be submitted to the City for buildings or portions thereof that are to be used for any of the following purposes:

1. Warehousing or storage
2. Retail including rack display of products
3. Hazardous material storage and/or use
4. Manufacturing

The OCL is intended to help satisfy the report/construction document requirements for the following City building (2015 International Building Code with local amendments) and fire code (2015 IFC with local amendments) sections:

- | | | |
|--------------------|--------------------|---------------------|
| ▪ 2015 IBC 107.1 | ▪ 2015 IFC 105.4.2 | ▪ 2015 IFC 5001.5.1 |
| ▪ 2015 IBC 414.1.3 | ▪ 2015 IFC 3201.3 | ▪ 2015 IFC 5001.5.2 |

III. SUBMITTAL PROCEDURES

- A. An OCL is required to be submitted with the building permit submittal documents when seeking a building permit, to the SAFD Fire Inspector during a Certificate of Occupancy inspection, or at any other time when required by the fire code official.
- B. If the OCL is prepared by a registered design professional representing the owner and/or tenant of the building/space in question, the OCL is to be countersigned by the owner and/or tenant. If the OCL (including all applicable Parts – See Sections IV and V below) is prepared by the owner and/or tenant of the building/space in question, **it is to be signed, dated and on company letterhead.**
- C. The OCL is to be kept on site at all times. A revised OCL is to be submitted to the Fire Marshal’s office for review prior to a change in the type or amount of hazardous material(s) used or stored, the type or amount of storage or storage height or method, or the manufacturing process.
- D. The following table gives examples of facilities that normally do and do not require an OCL to be submitted to the City. Please note that this is not intended to be a complete list of all facilities. Also, there may be circumstances which are different than that listed below and an OCL may or may not be required to determine code compliance. If you still have questions on whether or not your facility requires an OCL, please contact DSD’s Fire Protection Engineer at 210-207-8056.

FACILITIES THAT GENERALLY <u>DO</u> REQUIRE AN OCL	FACILITIES THAT GENERALLY <u>DO NOT</u> REQUIRE AN OCL
<ul style="list-style-type: none"> • Warehouses • Manufacturing facilities • Retail stores including rack display of products • Repair & maintenance shops • Laboratories • Hospitals 	<ul style="list-style-type: none"> • Assembly occupancies • Restaurants • Business offices • Schools • Daycares (including adult day care and assisted living facilities) • Residential uses (motels, hotels, apartments, live/work units, etc.)

- E. Please refer to [Information Bulletin 192b](#), which contains Frequently Asked Questions (FAQ’s), as well as definitions pertinent to High-Piled Combustible Storage and Hazardous Materials Inventory Statements.

IV. FORMAT

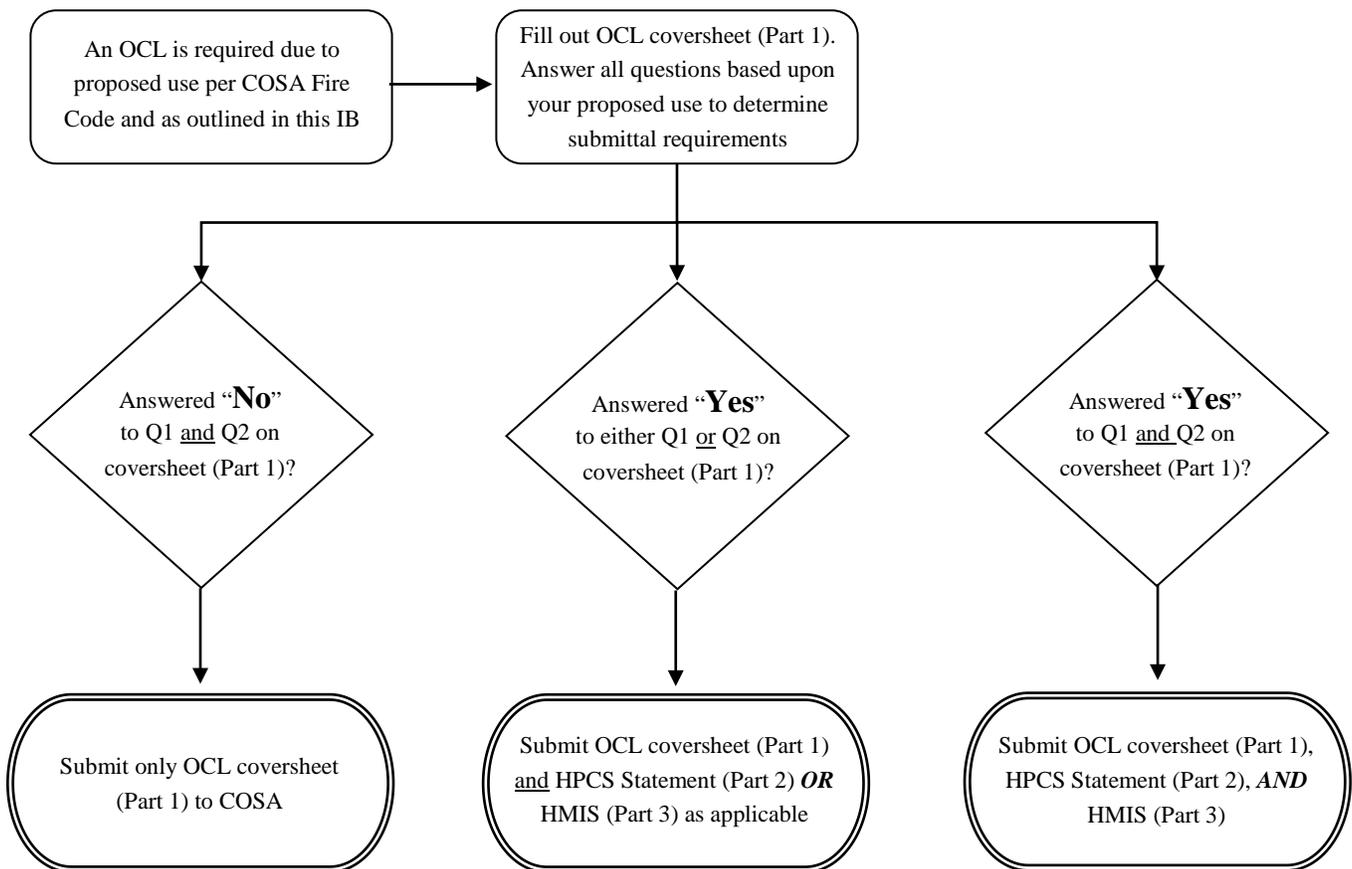
As noted in Section III.B above, the OCL may include one or more of the following parts. See the following attachments for the specific instructions for each part as well as some examples of each.

- **Part 1: Occupancy Classification Letter “Coversheet”**
- **Part 2: “High-Piled Combustible Storage Statement”**
- **Part 3: “Hazardous Materials Inventory Statement”**

*******Note that the design team may submit a comprehensive Fire Protection and Life Safety report that is of a different format than that outlined in this Information Bulletin as long as all the necessary information to determine code compliance is provided in the report. The report should include at least all the necessary information described in this Information Bulletin.**

V. SUBMITTAL REQUIREMENTS

A. The following flow chart is provided to assist you in determining what portions of the OCL (Parts 1, 2 and/or 3) that you are required to submit to the City for review.



Summary:

This Information Bulletin is for informational purposes only.

Prepared by: Amin Tohmaz, Development Services Engineer

Reviewed by: Christopher Monestier, Assistant Chief, SAFD
Terry Kannawin, Assistant Director, Plan Review

Authorized by: Roderick Sanchez, AICP, CBO, Director, DSD
Carl Wedige, Deputy Chief, SAFD

Occupancy Classification Letter (OCL) - Part 1 “Coversheet”

Correct identification and classification of commodities and hazardous materials is critical for safety and proper storage. Incorrect or missing identification and/or classification can result in processing delays, failed inspections, and delays in issuing a Certificate of Occupancy for the business. Hazardous materials and commodities require specialized protection systems aligned to the identification and classification per City building and fire codes and that meet the requirements of the business. It is strongly recommended the services of a fire protection design professional (e.g. TX Registered Fire Protection Engineer) be obtained to assist with correct classification and the design of an appropriate protection system.

This Occupancy Classification Letter (OCL) “Coversheet” **is to be filled out and signed by the owner of the business** and included in the building permit submittal package as required by the City’s fire code and building permit application procedures. Please see **Information Bulletin 192a** for further instructions and information regarding OCL requirements.

Q1: Do you have more than 500 ft² of High-Piled Combustible Storage? Yes No

If yes, you are required to submit an Occupancy Classification Letter Part 2, “High-Piled Combustible Storage Statement”. See attached to this IB.

High-Piled Combustible Storage is defined as the storage of combustible materials in closely packed piles or combustible materials on pallets, in racks or on shelves where the top of the storage is greater than 12 feet in height or certain high-hazard commodities, (e.g., rubber tires, Group A plastics, flammable liquids, idle pallets and similar commodities), where top of the storage is greater than 6 feet in height.

Q2: Do you handle (store or use) any hazardous materials as defined in the 2015 IFC? Yes No

If yes, you are required to submit an Occupancy Classification Letter Part 3, “Hazardous Materials Inventory Statement”. See attached to this IB.

A Hazardous Materials Inventory Statement lists those items which are classified as physical hazards and health hazards. A Physical Hazard is defined as chemical for which there is evidence that it is a combustible liquid, compressed gas, cryogenic, explosive, flammable gas, flammable liquid, flammable solid, organic peroxide, oxidizer, pyrophoric or unstable (reactive) or water-reactive material. A Health Hazard is a classification of a chemical for which there is statistically significant evidence that acute or chronic health effects are capable of occurring in exposed persons. The term “health hazard” includes chemicals that are toxic, highly toxic and corrosive. (See City’s fire code for further details.)

Q3: ANY amount of Class IV racks or back-to-back shelf storage over 10 feet high? Yes No

If yes, higher sprinkler densities than Ordinary Hazard Group 2 may be required.

Q4: ANY high Hazard storage over 5 feet high? Yes No

If yes, higher sprinkler densities than Ordinary Hazard Group 2 may be required.

Q5: General Information

Office/Warehouse Size:

What is being stored:

Type of storage (pallets, shelves, racks, etc.):

Height of storage:

I hereby certify that the information provided in this document is true and correct, to the best of my knowledge.

Signature

Date

Printed Name

Title

Company:

Occupancy Classification Letter (OCL) - Part 2 **“High-Piled Combustible Storage Statement”**

The following information will be used to determine the requirements for fire protection as specified in the 2015 International Fire Code, Chapters 32, 50, and applicable NFPA standards.

Facilities that will have High-Piled Combustible Storage MUST provide the following information:

- 1. Submit a floor plan of the building with locations and dimensions of storage areas.**
 - 1.1. Identify aisle dimensions between each storage array (See IFC Section 3206.9).
 - 1.2. If using rack storage, submit a dimensioned plan view and elevation plan of the rack system to include: location of tiers and location and dimensions of transverse and longitudinal flue spaces (See IFC 3208).
 - 1.3. If using separation of High-Piled storage areas (IFC 3206.3) indicate on the floor plan.
 - 1.4. Identify the location of any required fire department access doors. (See IFC 3206.6)
 - 1.5. Where required, identify the type, location, and provide the manufacturer’s specifications for any smoke and heat removal systems. (See IFC 3206.7)
 - 1.6. Where required, identify the location of draft curtains. (See IFC 3206.7)
- 2. In letter format, provide information on stored commodities. Each numbered item below corresponds to the numbered location on the example form.**
 - 2.1. Identify all commodities being stored (See 2015 IFC 3203) and identify their location on the floor plan in number 1 above.
 - 2.1.1. ***Note: If there are hazardous materials, the applicant shall also complete OCL Part 3 (HMIS) as outlined above*****
 - 2.2. Identify the individual container size, container type and total quantity of each commodity identified in number 2 above.
 - 2.3. Identify the total storage height of each commodity.
 - 2.4. Identify and describe the storage method(s) for each commodity (i.e., solid pile, shelf storage, mobile, bin box, or single, double, or multi-row racks). If using rack storage, identify if palletized or solid shelving.
 - 2.5. Provide the Commodity Classification as defined in IFC 3203.
 - 2.6. Identify the floor to ceiling height for each storage area.
 - 2.7. Identify the commodity clearances between the top of storage and the sprinkler deflector.
 - 2.8. Provide information on the proposed/existing fire protection systems (e.g., fire suppression, fire detection, etc.) in the storage areas. For the following situations, include the fire suppression system design criteria (i.e., design density, design area, special considerations, etc.) for each area with references to applicable codes and standards that show that the proposed/existing system is adequate to protect the proposed storage. This shall include reference to the specific tables/figures from IFC or NFPA 13 that was used to develop the design criteria (e.g., 2010 NFPA 13 Table 16.2.1.3.2, over 20 feet, class IV, not encapsulated, 4 ft aisles, no in rack, figure 16.2.1.3.2(d) curve G, apply Figure 16.2.1.3.4.1).
 - ✓ Any existing building with an existing fire sprinkler system
 - ✓ The use of Early Suppression Fast Response (ESFR) sprinklers
 - ✓ “Big box” type retail stores (i.e., Lowe’s, Home Depot, Costco, Sam’s Club, etc.)
 - ✓ Storage of exposed expanded Group A plastics
 - ✓ Group H Occupancies

Acme Commodities and Chemicals Company, Inc.
1234 Someplace St.
San Antonio, Texas 78000

I. General

Name of facility: Acme Commodities and Chemicals Warehouse and Mfg Center
 Address: 5678 Somewhere Else St. San Antonio, Texas 78111
 Contact Person: John Q. Citizen (210) xxx-xxxx
 Date of Report: 9/10/12

II. Warehousing and Storage

See attached floor plan for location of and dimensions of storage areas. Floor plan also indicates the location of each commodity being stored, as well as aisle dimensions, rack storage plans, access doors, locations and descriptions of smoke removal (vents), and locations and section of curtain boards to meet the High-Piled Combustible Storage requirements of the City's fire code (2015 International Fire Code with local amendments).

<u>2.1 - Commodity</u>	<u>2.2 - Quantity</u>	<u>2.3 - Maximum Storage Height</u>	<u>2.4 - Storage Method</u>	<u>2.5 - Commodity Classification</u>
Food in cardboard boxes	1200-1500 boxes	22 ft	Double row racks pallets	Class II
Rubber tires	1500 tires	10 ft	Single row racks – no solid shelving	High Hazard
Polystyrene widget	1000-1 lb. Widgets	4 ft	Solid pile	Class A plastic
Diesel	4-55 gal drum metal containers	5 ft	Rack- solid shelving	High Hazard (See Section IV)
Propane	20-20 gallon metal containers	5 ft	Rack- solid shelving	High Hazard (See Section IV)

<u>2.6 - Floor to Ceiling Height</u>	<u>2.7 - Commodity Clearance</u>	<u>2.8 - Proposed/Existing Fire Protection</u>
25 ft	Cardboard: 3 ft Tires: 15 ft Widgets: 21 ft Ethyl: 20 ft Propane: 20 ft	<p><u>Fire Sprinkler System:</u> Entire bldg. is protected with sprinkler system with following design criteria:</p> <ul style="list-style-type: none"> • Storage Area #1 _____ gpm/ _____ sq. ft. • Storage Area #2 _____ gpm/ _____ sq. ft. <p><u>Smoke and heat vents:</u> Provided at a ratio of _____</p> <p><u>Curtain boards:</u> Provided throughout warehouse - _____ ft. depth with maximum area formed by draft curtains at _____ sq. ft.</p>

III. Hazardous Materials

See attached HMIS Summary report(s) and HMIS Inventory report(s).

I hereby certify that the information provided in this Occupancy Classification Letter, including all attachments, is true and correct, to the best of my knowledge.

Signature

Date

John Q. Citizen
 Regional Manager
 Acme Commodities and Chemicals Company, Inc.

Occupancy Classification Letter (OCL) - Part 3 **“Hazardous Materials Inventory Statement (HMIS)”**

The HMIS shall be submitted in the format shown in Appendix H of the 2015 IFC. The report is in two sections, **Summary Report** and the **Inventory Report**.

1. **HMIS Summary Report** (see example format in Figure 4 of 2015 IFC Appendix H).
 - 1.1. *****Complete a summary report for each control area and Group H occupancy**
 - 1.2. The storage summary report is to include the total HMIS Inventory Report amounts of each applicable hazardous material in storage, use-closed conditions and use-open conditions.
 - 1.3. *****Provide separate summary reports for storage, use-closed and use-open systems.**
 - 1.4. Provide the applicable IBC/IFC Hazard Classification(s) for each material
 - 1.5. Inventory Amount [Solid (lb), Liquid (gal), Gas (cu.ft. at NTP)]
 - 1.6. IBC/IFC Maximum Allowable Quantity per control area (MAQ).

2. **HMIS Inventory Report** (see example format in Figure 5 of 2015 IFC Appendix H).
 - 2.1. Complete an inventory report *of hazardous materials* by listing products by location. Non-hazardous materials shall not be included in the inventory list.
 - 2.2. Product Name – Indicate the common or trade name for each material
 - 2.3. Components – For mixtures, specify percentages of major components if available.
 - 2.4. Chemical Abstract Service (CAS) Number – For mixtures, list CAS Numbers of major components if available.
 - 2.5. Location – Identify the control area or, if it is a Group H occupancy, provide the classification, such as H-2, H-3, etc.
 - 2.5.1. *****NOTE: The locations called out in the HMIS shall be readily identifiable on the associated plans submitted to the City for review.**
 - 2.6. Containers with a capacity of greater than 55 gallons (208L) – If product container, vessel or tank could exceed 55 gallons, indicate yes in column.
 - 2.7. Hazard Classification(s) – List applicable classifications for each product.
 - 2.7.1. *****NOTE: If the hazard class has sub-classifications, it is required to identify the sub-classification (i.e., the hazard class would be Combustible Liquid Class IIIA, not just Combustible Liquid).**
 - 2.7.2. *****NOTE: Material Safety Data Sheets (MSDS) are not a substitute for the above information**
 - 2.8. Stored – Amount of product in storage conditions.
 - 2.9. Closed – Amount of product in use-closed systems.
 - 2.10. Open – Amount of product in use-open systems

(This is an example; customer shall add additional hazard classes as needed. See Chapter 50 of the IFC for list of hazardous material classifications.)

Hazardous Materials Inventory Statement (HMIS) – SUMMARY REPORT^a
Storage Conditions^b

Name of facility: Acme Commodities and Chemicals Warehouse and Mfg Center
 Address: 5678 Somewhere Else St. San Antonio, Texas 78111
 Contact Person: John Q. Citizen (210) xxx-xxxx
 Date of Report: 9/10/12

Location: Control Area 1, Room 108

IBC/IFC Hazard Classification	Hazard Class	Maximum Inventory Amount			IBC/IFC Maximum Allowable Quantity ^c		
		(Abbrev)	Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)	Solid (lb)	Liquid (gal)
Combustible Liquid	II			110		240	
	IIIA						
	IIIB						
Combustible Fiber	Loose						
	Baled						
Cryogenic, Flammable	-						
Cryogenic, Oxidizing	-						
Flammable Gas	Gaseous						
	Liquefied						
Flammable Liquid	IA		25			60	
	IB & IC						
Flammable Liquid, combination (IA,1B,1C)	-						
Flammable Solid	FLS						
Inert Gas	Gaseous						
	Liquefied						
Cryogenic Inert	-						
Organic Peroxide	UD						
	I						
	II						
	III						
	IV						
	V						
Oxidizer	4						
	3						
	2						
	1						
Oxidizing Gas	Gaseous						
	Liquefied						
Pyrophoric	-						
Unstable (reactive)	4						
	3						
	2						
	2						
	1						
Water reactive	3						
	2						
	1						
Corrosives							
Highly Toxics							
Toxics							

a. Complete a summary report for each control area and H occupancy.

b. Storage = storage + use-closed + use-open systems

c. Include increases for sprinklers or storage in cabinets, if applicable.

(This is an example; customer shall add additional hazard classes as needed. See Chapter 50 of the IFC for list of hazardous material classifications.)

Hazardous Materials Inventory Statement (HMIS) – SUMMARY REPORT^a Use-Closed Conditions^b

Name of facility: Acme Commodities and Chemicals Warehouse and Mfg Center

Address: 5678 Somewhere Else St. San Antonio, Texas 78111

Contact Person: John Q. Citizen (210) xxx-xxxx

Date of Report: 9/10/12

Location: Control Area 1, Room 108

IBC/IFC Hazard Classification	Hazard Class (Abbrev)	Maximum Inventory Amount			IBC/IFC Maximum Allowable Quantity ^c		
		Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)	Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)
Combustible Liquid	II		100		UNL	240	
	IIIA						
	IIIB		13,200				
Combustible Fiber	Loose						
	Baled						
Cryogenic, Flammable	-						
Cryogenic, Oxidizing	-						
Flammable Gas	Gaseous						
	Liquefied						
Flammable Liquid	IA		10		UNL	60	
	IB & IC						
Flammable Liquid, combination (IA,1B,1C)	-						
Flammable Solid	FLS						
Inert Gas	Gaseous						
	Liquefied						
Cryogenic Inert	-						
Organic Peroxide	UD						
	I						
	II						
	III						
	IV						
	V						
Oxidizer	4						
	3						
	2						
	1						
Oxidizing Gas	Gaseous			1,500			3,000
	Liquefied						
Pyrophoric	-						
Unstable (reactive)	4						
	3						
	2						
	2						
	1						
Water reactive	3						
	2						
	1						
Corrosives							
Highly Toxics							
Toxics							

a. Complete a summary report for each control area and H occupancy.

b. Storage = storage + use-closed + use-open systems

c. Include increases for sprinklers or storage in cabinets, if applicable.

Hazardous Materials Inventory Statement (HMIS) – INVENTORY REPORT
(Sort products Alphabetically by Location of Product and then Alphabetically by Product name)

Name of facility: Acme Commodities and Chemicals Warehouse and Mfg Center
 Address: 5678 Somewhere Else St. San Antonio, Texas 78111
 Contact Person: John Q. Citizen (210) xxx-xxxx
 Date of Report: 9/10/12

Product Name ^c	CAS Number	Location ^a	Container > 55 gal ^b	Haz Class 1	Haz Class 2	Haz Class 3	Stored			Use-Closed			Use-Open		
							Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)	Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)	Solid (lb)	Liquid (gal)	Gas (ft ³ at NTP)
Acetylene, Gas	74-86-2	Control Area 1		FLG	UR2				150						
Black Aerosol Spray Paint	Mixture	Control Area 1		A-L3			24								
Gasoline, Unleaded	Mixture	Control Area 1		F1B				5							
Motor Oil - 10W40	64742-54-7 Mixture	Control Area 2		C3B				3							
Diesel	68476-34-6	Control Area 2	Yes	C2				225							
Transmission Fluid	64742-65-0	Control Area 2		C3B				3							
Oxygen, Gas	7782-44-7	H-3		OXG					5000						

(See Chapter 50 of the IFC for list of hazardous material classifications.)

- a. Identify the control area or, if it is an H occupancy, provide the classification, such as H-2, H-3, etc.
- b. If the product container, vessel, or tank could exceed 55 gallons, indicate yes in the column.
- c. Specify percentages of main components if available.
- d. In cubic feet, gallons or pounds