



New Castle County Government Center  
87 Reads Way  
New Castle, DE 19720  
Department of Land Use - Building Inspections

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Date: **September 21, 2007**  
Subject: **Hazardous Locations for Glazing**  
References: **2003 International Residential Code**

This Staff Code Interpretation is intended to be used to clarify Section R308.4 (Item 10) of the International Residential Code.

Below is the exact text from the section of the code in question:

***Section R308.4, Hazardous locations. The following shall be considered specific hazardous locations for the purposes of glazing:***

***10. Glazing Adjacent to stairways, landings, and ramps within 36 inches horizontally of a walking surface the exposed surface of the glass is less than 60 inches above the plane of the adjacent walking surface.***

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**Question:** For windows that are comprised of 2 panes of glass which are separated by airspace, is it the intent of the code to require that both panes be safety glazing? The issue we are facing as a jurisdiction is that the vast majority of these windows usually have both panes tempered; however, when one is missed by the installer, many have chosen to apply the 3M film pursuant to ES 94-41. This film is not able to be applied to the outer window surface as it will not be guaranteed by the manufacturer to withstand the elements. Is it enough to apply the film only to the interior surface of the exposed glazing, per code?

**Answer:** Both panes would be required to be safety glazed.

**NCC Stance:** Any product used to satisfy the tempering requirements in Section R308.4, needs to be tested and approved for exterior applications.

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**Code Updates:** While this section has been reorganized with the adoption of the 2015 IRC, the requirements pertaining to this interpretation are unchanged.

George O. Haggerty  
Code Official

**STAFF CODE INTERPRETATION**