

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Robert J Davidson  
**Date:** Monday, October 18, 2021 5:15:37 PM

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Commenter Contact Information

Name: Robert J Davidson

Date: 10/18/2021 12:00:00 AM

Representing: Davidson Code Concepts, LLC Mailing Address Number and Street: 311 Camperdown Court

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Proposed Building Standard

Title 24 Part #: Part 9

Section #: Chapter 11, Proposing a Section 11XX Proposing State Agency: SFM This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

The following language was approved for the 2024 IFC as part of the consent agenda vote at the ICC Public Comments Hearing 2021. It is a critical requirement addressing the safety of existing ESS installations.

Add the following language to Chapter 11:

"SECTION 1107

ENERGY STORAGE SYSTEMS

.1107.1 Lithium-ion technology energy storage systems. The owner of an energy storage system (ESS) utilizing lithium-ion battery technology having capacities exceeding the values in Table 1207.1.1 and that was installed prior to the jurisdiction's adoption of the 2018 or later edition of the International Fire Code shall provide the fire code official a failure modes and effects analysis (FMEA) or other approved hazard mitigation analysis in accordance with Section 104.8.2 for review and approval.

Exception: Detached one- and two-family dwellings and townhouses

1107.1.1 Early detection. In addition to the requirements of Section 1207.1.4.1 and 1207.1.4.2, the analysis shall include an assessment of the ability of the installed protection systems to provide for

early detection and notification of a thermal runaway event in relation to the ability of emergency responders to safely mitigate the size and impact of a thermal runaway event.

1107.1.2 Corrective action plan. Where hazards are identified by the analysis, a plan that includes a timetable for corrective action shall be submitted to the fire code official for review and approval. The plan shall include actions and system improvements necessary for eliminating or mitigating any identified hazards, including listed methods for early detection and notification of a thermal runaway event."

9 Point Criteria Info:

18930(a) 3