

Comparison of Fire Performance Requirements of the *IBC* and *IRC* for Wood Structural Panels and Foam Plastic Insulating Sheathing

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Introduction:

From the perspective of fire test performance requirements, foam plastic insulating sheathing is one of the most stringently regulated building products used in construction today. For example, [Section 2603](#) of the 2009 *International Building Code (IBC)* and [Section R316](#) of the 2009 *International Residential Code (IRC)* prescribe general fire test requirements for foam plastic insulation in addition to specific fire tests, many of them full scale, for specific applications. As a point of comparison to another very common insulation/sheathing material, wood structural panels (WSP) are subject to very few fire test requirements.

This *Tech Matters* provides a brief comparison of the fire-resistance-related building code provisions for these two types of building materials.

Discussion:

[Table 1](#) presents a comparison between code requirements for foam sheathing versus a common wood structural sheathing (Oriented Strand Board, OSB).

General Characteristics	Foam Plastic Insulating Sheathing	Wood Structural Panel (WSP) Sheathing
Surface Burning / Flame Spread Index (ASTM E84) ¹	Generally, a Flame Spread Index of 75 or less (lower index number indicates less flame spread). In multi-story commercial structures of types I, II, III or IV, a flame spread index of 25 or less.	No code limits even though the reported flame spread index range is 74-172 ² for ½" oriented strand board (OSB) wood structural panels
Smoke Developed Index (ASTM E84)	Smoke Developed Index of 450 or less (lower rating number indicates less smoke developed)	No specific code limits, although WSPs are generally classified as a Class C sheathing requiring a smoke developed rating of 450 or less ³ .
Thermal Barrier (typically ½" gypsum) required to separate the sheathing from the interior of the building.	Yes – except in specific cases such as attics and crawlspaces, or unless a full-scale fire test is performed	No <i>IBC</i> or <i>IRC</i> thermal barrier required.
Ignition Temperature	Greater than 600 F ⁴	400 F – 500 F ⁵

Table 1: Comparison of *IBC* and *IRC* Fire-Related Code Requirements for Foam Plastic Insulating Sheathing and Wood Structural Panel (WSP) Sheathing

¹ American Society of Testing and Materials, ASTM E 84, *Standard Test Method for Surface Burning Characteristics of Building Materials*

² American Wood Council DCA 1- <http://awc.org/publications/DCA/DCA1/DCA1.pdf>

³ American Wood Council DCA 1- <http://awc.org/publications/DCA/DCA1/DCA1.pdf>

⁴ http://www.exiba.org/Properties_of_XPS.asp#Fire (see [Appendix](#))

⁵ <http://osbguide.tecotested.com/pdfs/en/tb115.pdf>

Surface Burning Characteristics (ASTM E84):⁶

The *IBC* and *IRC* refer to ASTM E84 as the appropriate test method for evaluating surface burning characteristics (flame spread) for many building materials. As can be seen in [Table 1](#), foam plastic insulating sheathing is generally required to meet a flame spread index of 75 or less, while oriented strand board (OSB), a common WSP, has a flame spread index that varies widely and is as high as 172 for 1/2" thicknesses. The flame spread index range for several popular OSB thicknesses is shown in [Table 2](#).

Oriented Strand Board (OSB) Thickness	Flame Spread Index, ASTM E84 Tests ⁷
5/16"	127-138
7/16"	86-150
1/2"	74-172

Table 2: OSB Flame Spread Index Ranges from ASTM E84 Tests

Thermal Barrier on the Interior Side of Walls:

Most fires in the residential sector originate inside the home. Thus, the requirement is warranted for foam plastic insulating sheathings to be separated from the interior of a building by a 15-minute thermal barrier, typically 1/2" gypsum board. There are no similar requirements in the *IBC* or *IRC* for a thermal barrier on the inside of the wall when WSPs are used as exterior sheathing. It should be noted that neither 3/8" nor 15/32" OSB can meet the 15-minute requirement, so it cannot serve as a thermal barrier. Per the *IBC*, [Table 721.6.2\(1\)](#), these thicknesses of OSB have a stated fire endurance rating of 5 and 10 minutes, respectively.

Regulation of Exterior Walls:

To limit the spread of fire from one building to another, the *IBC* and *IRC* regulate separation distances between buildings. *IRC* [Section R602](#) states that if the separation distance is 5' or less, the walls facing that separation distance must have a 1-hour fire resistance rating, when tested in accordance with ASTM E119 with the fire exposure on the *outside* of the wall. To date, no evidence has been provided that would suggest that this provision has not been effective.

[Table R302.1](#) from the 2009 *IRC* is copied below to illustrate the *IRC* requirements:

TABLE R302.1
EXTERIOR WALLS

EXTERIOR WALL ELEMENT		MINIMUM FIRE-RESISTANCE RATING	MINIMUM FIRE SEPARATION DISTANCE
Walls	(Fire-resistance rated)	1 hour-tested in accordance with ASTM E 119 or UL 263 with exposure from both sides	< 5 feet
	(Not fire-resistance rated)	0 hours	≥ 5 feet

Similarly, the 2009 *IBC*, [Table 602](#), lists fire separation requirements. If the separation distance is less than 10' in a Type VB (e.g. combustible unprotected) construction, the walls facing that separation distance must have a 1-hour fire resistance rating.

Note: In *IBC* [Table 602](#), where the fire separation distance is greater than 5' and less than 10', Type VB construction falls under the "Others" category. Type IA (noncombustible, protected) construction has a higher fire resistance requirement due to its generally unlimited height and area.

TABLE 602
FIRE-RESISTANCE RATING REQUIREMENTS FOR EXTERIOR WALLS BASED ON FIRE SEPARATION DISTANCE^{a, b}

FIRE SEPARATION DISTANCE = X (feet)	TYPE OF CONSTRUCTION	OCCUPANCY GROUP H ¹	OCCUPANCY GROUP F-1, M, S-1 ^g	OCCUPANCY GROUP A, B, E, F-2, I, R, S-2 ^g , U ^b
X < 5 ^c	All	3	2	1
5 ≤ X < 10	IA	3	2	1
	Others	2	1	1

⁶ ASTM E 84-Standard Test Method for Surface Burning Characteristics of Building Materials

⁷ American Wood Council DCA 1- <http://awc.org/publications/DCA/DCA1/DCA1.pdf>

Conclusion:

It is clear there is a wide disparity in the current requirements to regulate the use of sheathing/insulation products on the basis of equivalent performance. As shown in this *Tech Matters*, foam plastic insulating sheathing is held to a higher standard than wood structural panels (i.e. OSB). The flame spread index of foam plastics is required by the code to be limited to 75, while OSB can be as high as 172 for ½" material. Interior thermal barriers are required for foam plastics, while there is no such requirement for WSPs. Foam plastics are held to this higher standard even though these products have an ignition temperature considerably higher than OSB. Moving forward in developing building codes, there should be a performance-based, level playing field for all products. A more comprehensive approach should be taken to provide performance-based fire provisions related to insulation/sheathing applications. All products that serve these markets should be required to meet the same standard of care. Any new code provisions that are considered should be product neutral and apply in a manner so that product performance comparisons can be made on an apples-to-apples basis.

Appendix A

Ignitability and flame propagation

Polystyrene foams start to soften and shrink from 100°C. They melt at even higher temperatures. If the melted mass gets further heated, ignitable decomposition gases are created at about 350°C (662°F). Without a flame source and temperatures above 450 to 500°C (842 to 932°F) lead to the ignition of the decomposition products. Up to these temperatures, polystyrene foam is not self-ignitable.

TABLE 721.6.2(1)
TIME ASSIGNED TO WALLBOARD MEMBRANES^{a, b, c, d}

DESCRIPTION OF FINISH	TIME ^e (minutes)
³ / ₈ -inch wood structural panel bonded with exterior glue	5
¹⁵ / ₃₂ -inch wood structural panel bonded with exterior glue	10
¹⁹ / ₃₂ -inch wood structural panel bonded with exterior glue	15
³ / ₈ -inch gypsum wallboard	10
¹ / ₂ -inch gypsum wallboard	15
⁵ / ₈ -inch gypsum wallboard	30
¹ / ₂ -inch Type X gypsum wallboard	25
⁵ / ₈ -inch Type X gypsum wallboard	40
Double ³ / ₈ -inch gypsum wallboard	25
¹ / ₂ -inch + ³ / ₈ -inch gypsum wallboard	35
Double ¹ / ₂ -inch gypsum wallboard	40

For SI: 1 inch = 25.4 mm.

- a. These values apply only when membranes are installed on framing members which are spaced 16 inches o.c.
- b. Gypsum wallboard installed over framing or furring shall be installed so that all edges are supported, except ⁵/₈-inch Type X gypsum wallboard shall be permitted to be installed horizontally with the horizontal joints staggered 24 inches each side and unsupported but finished.
- c. On wood frame floor/ceiling or roof/ceiling assemblies, gypsum board shall be installed with the long dimension perpendicular to framing members and shall have all joints finished.
- d. The membrane on the unexposed side shall not be included in determining the fire resistance of the assembly. When dissimilar membranes are used on a wall assembly, the calculation shall be made from the least fire-resistant (weaker) side.
- e. The time assigned is not a finished rating.

2009 IBC, Section 2603

FOAM PLASTIC INSULATION

2603.1 General. The provisions of this section shall govern the requirements and uses of foam plastic insulation in buildings and structures.

2603.2 Labeling and identification. Packages and containers of foam plastic insulation and foam plastic insulation components delivered to the job site shall bear the *label* of an *approved agency* showing the manufacturer's name, product listing, product identification and information sufficient to determine that the end use will comply with the code requirements.

2603.3 Surface-burning characteristics. Unless otherwise indicated in this section, foam plastic insulation and foam plastic cores of manufactured assemblies shall have a flame spread index of not more than 75 and a smoke-developed index of not more than 450 where tested in the maximum thickness intended for use in accordance with ASTM E 84 or UL 723. Loose fill-type foam plastic insulation shall be tested as board stock for the flame spread and smoke-developed indexes.

Exceptions:

1. Smoke-developed index for interior *trim* as provided for in Section 2604.2.
2. In cold storage buildings, ice plants, food plants, food processing rooms and similar areas, foam plastic insulation where tested in a thickness of 4 inches (102 mm) shall be permitted in a thickness up to 10 inches (254 mm) where the building is equipped throughout with an automatic fire sprinkler system in accordance with Section 903.3.1.1. The approved *automatic sprinkler system* shall be provided in both the room and that part of the building in which the room is located.
3. Foam plastic insulation that is a part of a Class A, B or C roof-covering assembly provided the assembly with the foam plastic insulation satisfactorily passes FM 4450 or UL 1256. The smoke-developed index shall not be limited for roof applications.
4. Foam plastic insulation greater than 4 inches (102 mm) in thickness shall have a maximum flame spread index of 75 and a smoke-developed index of 450 where tested at a minimum thickness of 4 inches (102 mm), provided the end use is approved in accordance with Section 2603.9 using the thickness and density intended for use.
5. Flame spread and smoke-developed indexes for foam plastic interior signs in *covered mall buildings* provided the signs comply with Section 402.15.

2603.4 Thermal barrier. Except as provided for in Sections 2603.4.1 and 2603.9, foam plastic shall be separated from the interior of a building by an approved thermal barrier of 1/2-inch (12.7 mm) gypsum wallboard or equivalent thermal barrier material that will limit the average temperature rise of the unexposed surface to not more than 250°F (120 C) after 15 minutes of fire exposure, complying with the standard time-temperature curve of ASTM E 119 or UL 263. The thermal barrier shall be installed in such a manner that it will remain in place for 15 minutes based on FM 4880, UL 1040, NFPA 286 or UL 1715. Combustible concealed spaces shall comply with Section 717.

2603.4.1 Thermal barrier not required. The thermal barrier specified in Section 2603.4 is not required under the conditions set forth in Sections 2603.4.1.1 through 2603.4.1.13.

2603.4.1.1 Masonry or concrete construction. A thermal barrier is not required for foam plastic installed in a masonry or concrete wall, floor or roof system where the foam plastic insulation is covered on each face by a minimum of 1 inch (25 mm) thickness of masonry or concrete.

2603.4.1.2 Cooler and freezer walls. Foam plastic installed in a maximum thickness of 10 inches (254 mm) in cooler and freezer walls shall:

1. Have a flame spread index of 25 or less and a smoke-developed index of not more than 450, where tested in a minimum 4 inch (102 mm) thickness.
2. Have flash ignition and self-ignition temperatures of not less than 600°F and 800°F (316°C and 427°C), respectively.
3. Have a covering of not less than 0.032-inch (0.8 mm) aluminum or corrosion-resistant steel having a base metal thickness not less than 0.0160 inch (0.4 mm) at any point.
4. Be protected by an *automatic sprinkler system* in accordance with Section 903.3.1.1. Where the cooler or freezer is within a building, both the cooler or freezer and that part of the building in which it is located shall be sprinklered.

2603.4.1.3 Walk-in coolers. In nonsprinklered buildings, foam plastic having a thickness that does not exceed 4 inches (102 mm) and a maximum flame spread index of 75 is permitted in walk-in coolers or freezer units where the aggregate floor area does not exceed 400 square feet (37 m²) and the foam plastic is covered by a metal facing not less than 0.032-inch-thick (0.81 mm) aluminum or corrosion-resistant steel having a minimum base metal thickness of 0.016 inch (0.41 mm). A thickness of up to 10 inches (254 mm) is permitted where protected by a thermal barrier.

2603.4.1.4 Exterior walls—one-story buildings. For one-*story* buildings, foam plastic having a flame spread index of 25 or less, and a smoke-developed index of not more than 450, shall be permitted without thermal barriers

in or on *exterior walls* in a thickness not more than 4 inches (102 mm) where the foam plastic is covered by a thickness of not less than 0.032-inch-thick (0.81 mm) aluminum or corrosion-resistant steel having a base metal thickness of 0.0160 inch (0.41 mm) and the building is equipped throughout with an *automatic sprinkler system* in accordance with Section 903.3.1.1.

2603.4.1.5 Roofing. Foam plastic insulation under a roof assembly or roof covering that is installed in accordance with the code and the manufacturer's instructions shall be separated from the interior of the building by wood structural panel sheathing not less than 0.47 inch (11.9 mm) in thickness bonded with exterior glue, with edges supported by blocking, tongue-and-groove joints or other approved type of edge support, or an equivalent material. A thermal barrier is not required for foam plastic insulation that is a part of a Class A, B or C roof-covering assembly, provided the assembly with the foam plastic insulation satisfactorily passes FM 4450 or UL 1256.

2603.4.1.6 Attics and crawl spaces. Within an *attic* or *crawl space* where entry is made only for service of utilities, foam plastic insulation shall be protected against ignition by 1 1/2-inch-thick (38 mm) mineral fiber insulation;

1/4-inch-thick (6.4 mm) wood structural panel, particleboard or hardboard; 3/8-inch (9.5 mm) gypsum wallboard, corrosion-resistant steel having a base metal thickness of 0.016 inch (0.4 mm) or other approved material installed in such a manner that the foam plastic insulation is not exposed. The protective covering shall be consistent with the requirements for the type of construction.

2603.4.1.7 Doors not required to have a fire protection rating. Where pivoted or side-hinged doors are permitted without a fire protection rating, foam plastic insulation, having a flame spread index of 75 or less and a smoke-developed index of not more than 450, shall be permitted as a core material where the door facing is of metal having a minimum thickness of 0.032-inch (0.8 mm) aluminum or steel having a base metal thickness of not less than 0.016 inch (0.4 mm) at any point.

2603.4.1.8 Exterior doors in buildings of Group R-2 or R-3. In occupancies classified as Group R-2 or R-3, foam-filled exterior entrance doors to individual *dwelling units* that do not require a fire-resistance rating shall be faced with wood or other approved materials.

2603.4.1.9 Garage doors. Where garage doors are permitted without a fire-resistance rating and foam plastic is used as a core material, the door facing shall be metal having a minimum thickness of 0.032-inch (0.8 mm) aluminum or 0.010-inch (0.25 mm) steel or the facing shall be minimum 0.125-inch-thick (3.2 mm) wood. Garage doors having facings other than those described above shall be tested in accordance with, and meet the acceptance criteria of, DASMA 107.

Exception: Garage doors using foam plastic insulation complying with Section 2603.3 in detached and attached garages associated with one- and two-family dwellings need not be provided with a thermal barrier.

2603.4.1.10 Siding backer board. Foam plastic insulation of not more than 2,000 British thermal units per square feet (Btu/sq. ft.) (22.7 mJ/m²) as determined by NFPA 259 shall be permitted as a siding backer board with a maximum thickness of 1/2 inch (12.7 mm), provided it is separated from the interior of the building by not less than 2 inches (51 mm) of mineral fiber insulation or equivalent or where applied as insulation with residing over existing wall construction.

2603.4.1.11 Interior trim. Foam plastic used as interior *trim* in accordance with Section 2604 shall be permitted without a thermal barrier.

2603.4.1.12 Interior signs. Foam plastic used for interior signs in *covered mall buildings* in accordance with Section 402.16 shall be permitted without a thermal barrier. Foam plastic signs that are not affixed to interior building surfaces shall comply with Chapter 8 of the *International Fire Code*.

2009 IRC, Chapter 2

2603.4.1.13 Type V construction. Foam plastic spray applied to a sill plate and header of Type V construction is subject to all of the following:

1. The maximum thickness of the foam plastic shall be 3/4 inches (82.6 mm).
2. The density of the foam plastic shall be in the range of 1.5 to 2.0 pcf (24 to 32 kg/m³).
3. The foam plastic shall have a flame spread index of 25 or less and an accompanying smoke-developed index of 450 or less when tested in accordance with ASTM E 84 or UL 723.

2603.5 Exterior walls of buildings of any height. *Exterior walls* of buildings of Type I, II, III or IV construction of any height shall comply with Sections 2603.5.1 through 2603.5.7. *Exterior walls* of cold storage buildings required to be constructed of noncombustible materials, where the building is more than one *story* in height, shall also comply with the provisions of Sections 2603.5.1 through 2603.5.7. *Exterior walls* of buildings of Type V construction shall comply with Sections 2603.2, 2603.3 and 2603.4.

2603.5.1 Fire-resistance-rated walls. Where the wall is required to have a fire-resistance rating, data based on tests conducted in accordance with ASTM E 119 or UL 263 shall be provided to substantiate that the fire-resistance rating is maintained.

2603.5.2 Thermal barrier. Any foam plastic insulation shall be separated from the building interior by a thermal barrier meeting the provisions of Section 2603.4, unless special approval is obtained on the basis of Section 2603.9.

Exception: One-story buildings complying with Section 2603.4.1.4.

2603.5.3 Potential heat. The potential heat of foam plastic insulation in any portion of the wall or panel shall not exceed the potential heat expressed in Btu per square feet (mJ/m²) of the foam plastic insulation contained in the wall assembly tested in accordance with Section 2603.5.5. The potential heat of the foam plastic insulation shall be determined by tests conducted in accordance with NFPA259 and the results shall be expressed in Btu per square feet (mJ/m²).

Exception: One-story buildings complying with Section 2603.4.1.4.

2603.5.4 Flame spread and smoke-developed indexes.

Foam plastic insulation, exterior coatings and facings shall be tested separately in the thickness intended for use, but not to exceed 4 inches (102 mm), and shall each have a flame spread index of 25 or less and a smoke-developed index of 450 or less as determined in accordance with ASTM E 84 or UL 723.

Exception: Prefabricated or factory-manufactured panels having minimum 0.020-inch (0.51 mm) aluminum facings and a total thickness of 1/4 inch (6.4 mm) or less are permitted to be tested as an assembly where the foam plastic core is not exposed in the course of construction.

2603.5.5 Test standard. The wall assembly shall be tested in accordance with and comply with the acceptance criteria of NFPA 285.

Exception: One-story buildings complying with Section 2603.4.1.4.

2603.5.6 Label required. The edge or face of each piece of foam plastic insulation shall bear the *label* of an *approved agency*. The *label* shall contain the manufacturer's or distributor's identification, model number, serial number or definitive information describing the product or materials' performance characteristics and *approved agency's* identification.

2603.5.7 Ignition. *Exterior walls* shall not exhibit sustained flaming where tested in accordance with NFPA 268. Where a material is intended to be installed in more than one thickness, tests of the minimum and maximum thickness intended for use shall be performed.

Exception: Assemblies protected on the outside with one of the following:

1. A thermal barrier complying with Section 2603.4.
2. A minimum 1 inch (25 mm) thickness of concrete or masonry.
3. Glass-fiber-reinforced concrete panels of a minimum thickness of 3/8 inch (9.5 mm).
4. Metal-faced panels having minimum 0.019-inch-thick (0.48 mm) aluminum or 0.016-inch-thick (0.41 mm) corrosion-resistant steel outer facings.
5. A minimum 7/8 inch (22.2 mm) thickness of stucco complying with Section 2510.

2603.6 Roofing. Foam plastic insulation meeting the requirements of Sections 2603.2, 2603.3 and 2603.4 shall be permitted as part of a roof-covering assembly, provided the assembly with the foam plastic insulation is a Class A, B or C roofing assembly where tested in accordance with ASTM E 108 or UL 790.

2603.7 Plenums. Foam plastic insulation shall not be used as interior wall or ceiling finish in plenums except as permitted in Section 2604 or when protected by a thermal barrier in accordance with Section 2603.4.

2603.8 Protection against termites. In areas where the probability of termite infestation is very heavy in accordance with Figure 2603.8, extruded and expanded polystyrene, polyisocyanurate and other foam plastics shall not be

installed on the exterior face or under interior or exterior foundation walls or slab foundations located below grade. The clearance between foam plastics installed above grade and exposed earth shall be at least 6 inches (152 mm).

Exceptions:

1. Buildings where the structural members of walls, floors, ceilings and roofs are entirely of noncombustible materials or preservative-treated wood.
2. An approved method of protecting the foam plastic and structure from subterranean termite damage is provided.
3. On the interior side of basement walls.

2603.9 Special approval. Foam plastic shall not be required to comply with the requirements of Sections 2603.4 through 2603.7 where specifically approved based on large-scale tests such as, but not limited to, NFPA 286 (with the acceptance criteria of Section 803.2), FM 4880, UL 1040 or UL 1715. Such testing shall be related to the actual end-use configuration and be performed on the finished manufactured foam plastic assembly in the maximum thickness intended for use. Foam plastics that are used as interior finish on the basis of special tests shall also conform to the flame spread requirements of Chapter 8. Assemblies tested shall include seams, joints and other typical details used in the installation of the assembly and shall be tested in the manner intended for use.

FIRE SEPARATION DISTANCE. The distance measured from the building face to one of the following:

1. To the closest interior *lot line*; or
2. To the centerline of a street, an alley or public way; or
3. To an imaginary line between two buildings on the *lot*.

2009 IBC, Table 602

**TABLE 602
FIRE-RESISTANCE RATING REQUIREMENTS FOR EXTERIOR WALLS BASED ON FIRE SEPARATION DISTANCE^{a, e}**

FIRE SEPARATION DISTANCE = X (feet)	TYPE OF CONSTRUCTION	OCCUPANCY GROUP H ^f	OCCUPANCY GROUP F-1, M, S-1 ^g	OCCUPANCY GROUP A, B, E, F-2, I, R, S-2 ^g , U ^b
X < 5 ^c	All	3	2	1
5 ≤ X < 10	IA	3	2	1
	Others	2	1	1
10 ≤ X < 30	IA, IB	2	1	1 ^d
	IIB, VB	1	0	0
	Others	1	1	1 ^d
X ≥ 30	All	0	0	0

For SI: 1 foot = 304.8 mm.

- a. Load-bearing exterior walls shall also comply with the fire-resistance rating requirements of Table 601.
- b. For special requirements for Group U occupancies, see Section 406.1.2.
- c. See Section 706.1.1 for party walls.
- d. Open parking garages complying with Section 406 shall not be required to have a fire-resistance rating.
- e. The fire-resistance rating of an exterior wall is determined based upon the fire separation distance of the exterior wall and the story in which the wall is located.
- f. For special requirements for Group H occupancies, see Section 415.3.
- g. For special requirements for Group S aircraft hangars, see Section 412.4.1.

2009 *IRC*, Section R316

SECTION R316

FOAM PLASTIC

R316.1 General. The provisions of this section shall govern the materials, design, application, construction and installation of foam plastic materials.

R316.2 Labeling and identification. Packages and containers of foam plastic insulation and foam plastic insulation components delivered to the job site shall bear the *label* of an *approved agency* showing the manufacturer's name, the product listing, product identification and information sufficient to determine that the end use will comply with the requirements.

R316.3 Surface burning characteristics. Unless otherwise allowed in Section R316.5 or R316.6, all foam plastic or foam plastic cores used as a component in manufactured assemblies used in building construction shall have a flame spread index of not more than 75 and shall have a smoke-developed index of not more than 450 when tested in the maximum thickness intended for use in accordance with ASTM E 84 or UL 723. Loose-fill type foam plastic insulation shall be tested as board stock for the flame spread index and smoke-developed index.

Exception: Foam plastic insulation more than 4 inches (102 mm) thick shall have a maximum flame spread index of 75 and a smoke-developed index of 450 where tested at a minimum thickness of 4 inches (102 mm), provided the end use is *approved* in accordance with Section R316.6 using the thickness and density intended for use.

R316.4 Thermal barrier. Unless otherwise allowed in Section R316.5 or Section R316.6, foam plastic shall be separated from the interior of a building by an *approved* thermal barrier of minimum 1/2 inch (12.7 mm) gypsum wallboard or an *approved* finish material equivalent to a thermal barrier material that will limit the average temperature rise of the unexposed surface to no more than 250°F (139°C) after 15 minutes of fire exposure complying with the ASTM E 119 or UL263 standard time temperature curve. The thermal barrier shall be installed in such a manner that it will remain in place for 15 minutes based on NFPA 286 with the acceptance criteria of Section R302.9.4, FM 4880, UL 1040 or UL 1715.

R316.5 Specific requirements. The following requirements shall apply to these uses of foam plastic unless specifically *approved* in accordance with Section R316.6 or by other sections of the code or the requirements of Sections R316.2 through R316.4 have been met.

R316.5.1 Masonry or concrete construction. The thermal barrier specified in Section R316.4 is not required in a masonry or concrete wall, floor or roof when the foam plastic insulation is separated from the interior of the building by a minimum 1-inch (25 mm) thickness of masonry or concrete.

R316.5.2 Roofing. The thermal barrier specified in Section R316.4 is not required when the foam plastic in a roof assembly or under a roof covering is installed in accordance with the code and the manufacturer's installation instructions and is separated from the interior of the building by tongue-and-groove wood planks or wood structural panel sheathing in accordance with Section R803, not less than 15/32 inch (11.9 mm) thick bonded with exterior glue and identified as Exposure 1, with edges supported by blocking or tongue-and-groove joints or an equivalent material. The smoke-developed index for roof applications shall not be limited.

R316.5.3 Attics. The thermal barrier specified in Section R316.4 is not required where all of the following apply:

1. *Attic* access is required by Section R807.1.
2. The space is entered only for purposes of repairs or maintenance.
3. The foam plastic insulation is protected against ignition using one of the following ignition barrier materials:
 - 3.1. 1 1/2-inch-thick (38 mm) mineral fiber insulation;
 - 3.2. 1/4-inch-thick (6.4 mm) wood structural panels;
 - 3.3. 3/8-inch (9.5 mm) particleboard;
 - 3.4. 1/4-inch (6.4 mm) hardboard;
 - 3.5. 3/8-inch (9.5 mm) gypsum board; or
 - 3.6. Corrosion-resistant steel having a base metal thickness of 0.016 inch (0.406 mm).

The above ignition barrier is not required where the foam plastic insulation has been tested in accordance with Section R316.6.

R316.5.4 Crawl spaces. The thermal barrier specified in Section R316.4 is not required where all of the following apply:

1. Crawlspace access is required by Section R408.4
2. Entry is made only for purposes of repairs or maintenance.
3. The foam plastic insulation is protected against ignition using one of the following ignition barrier materials:
 - 3.1. 1 1/2-inch-thick (38 mm) mineral fiber insulation;
 - 3.2. 1/4-inch-thick (6.4 mm) wood structural panels;

- 3.3. 3/8-inch (9.5 mm) particleboard;
- 3.4. 1/4-inch (6.4 mm) hardboard;
- 3.5. 3/8-inch (9.5 mm) gypsum board; or
- 3.6. Corrosion-resistant steel having a base metal thickness of 0.016 inch (0.406 mm).

The above ignition barrier is not required where the foam plastic insulation has been tested in accordance with Section R316.6.

R316.5.5 Foam-filled exterior doors. Foam-filled exterior doors are exempt from the requirements of Sections R316.3 and R316.4.

R316.5.6 Foam-filled garage doors. Foam-filled garage doors in attached or detached garages are exempt from the requirements of Sections R316.3 and R316.4.

R316.5.7 Foam backer board. The thermal barrier specified in Section R316.4 is not required where siding backer

board foam plastic insulation has a maximum thickness of 0.5 inch (12.7 mm) and a potential heat of not more than 2000 Btu per square foot (22 720 kJ/m²) when tested in accordance with NFPA 259 provided that:

1. The foam plastic insulation is separated from the interior of the building by not less than 2 inches (51 mm) of mineral fiber insulation or
2. The foam plastic insulation is installed over existing *exterior wall* finish in conjunction with re-siding or
3. The foam plastic insulation has been tested in accordance with Section R316.6.

R316.5.8 Re-siding. The thermal barrier specified in Section R316.4 is not required where the foam plastic insulation is installed over existing *exterior wall* finish in conjunction with re-siding provided the foam plastic has a maximum thickness of 0.5 inch (12.7 mm) and a potential heat of not more than 2000 Btu per square foot (22 720 kJ/m²) when tested in accordance with NFPA 259.

R316.5.9 Interior trim. The thermal barrier specified in Section R316.4 is not required for exposed foam plastic interior trim, provided all of the following are met:

1. The minimum density is 20 pounds per cubic foot (320 kg/m³).
2. The maximum thickness of the trim is 0.5 inch (12.7 mm) and the maximum width is 8 inches (204 mm).
3. The interior trim shall not constitute more than 10 percent of the aggregate wall and ceiling area of any room or space.
4. The flame spread index does not exceed 75 when tested per ASTM E84. The smoke-developed index is not limited.

R316.5.10 Interior finish. Foam plastics shall be permitted as interior finish where *approved* in accordance with Section R316.6. Foam plastics that are used as interior finish shall also meet the flame spread index and smoke-developed index requirements of Sections R302.9.1 and R302.9.2.

R316.5.11 Sill plates and headers. Foam plastic shall be permitted to be spray applied to a sill plate and header without the thermal barrier specified in Section R316.4 subject to all of the following:

1. The maximum thickness of the foam plastic shall be 3/4 inches (83 mm).
2. The density of the foam plastic shall be in the range of 0.5 to 2.0 pounds per cubic foot (8 to 32 kg/m³).
3. The foam plastic shall have a flame spread index of 25 or less and an accompanying smoke developed index of 450 or less when tested in accordance with ASTM E 84.

R316.5.12 Sheathing. Foam plastic insulation used as sheathing shall comply with Section R316.3 and Section R316.4. Where the foam plastic sheathing is exposed to the *attic* space at a gable or kneewall, the provisions of Section R316.5.3 shall apply.

R316.6 Specific approval. Foam plastic not meeting the requirements of Sections R316.3 through R316.5 shall be specifically *approved* on the basis of one of the following *approved* tests: NFPA 286 with the acceptance criteria of Section R302.9.4, FM4880, UL 723, UL 1040 or UL 1715, or fire tests related to actual end-use configurations. The specific approval shall be based on the actual end use configuration and shall be performed on the finished foam plastic assembly in the maximum thickness intended for use. Assemblies tested shall include seams, joints and other typical details used in the installation of the assembly and shall be tested in the manner intended for use.

R316.7 Termite damage. The use of foam plastics in areas of "very heavy" termite infestation probability shall be in accordance with Section R318.4.