GG230-14 804.1.1

Proponent: Don Denton, representing self (ventfree@comcast.net)

Revise as follows:

804.1 Fireplaces and appliances. Where located within buildings, fireplaces, <u>and</u> solid fuel-burning appliances, <u>vented decorative gas</u> appliances, vented gas fireplace heaters and decorative gas appliances for installation in fireplaces shall comply with Sections 804.1.1 through 804.1.3. <u>Unvented room heaters and unvented decorative appliances</u>, including alcohol burning, shall be prohibited.

804.1.1 Venting and combustion air. Fireplaces and solid_fuel-burning appliances shall be vented to the outdoors and shall be provided with combustion air provided from the outdoors in accordance with the International *Mechanical Code* and the International *Fuel Gas Code*. Solid-fuel-burning fireplaces shall be provided with a means to tightly close off the chimney flue and combustion air openings when the fireplace is not in use.

Reason: Acceptance of this code change proposal would eliminate the requirement for all gas appliances to be vented to the outdoors, and it would allow unvented room heaters and unvented decorative appliances. Once the text is changed to allow unvented gas appliances, the text of the remaining subsections deals only with solid-fuel appliances and fireplaces. Section 804.1.1 disallowed unvented appliances by requiring all appliances to be vented to the outdoors, but as revised, unvented appliances would be allowed and all other types of gas-fired appliances would still be required to be vented by the IFGC. It is unnecessary for the IgCC to require appliances to be vented because that is already required by the IMC and IFGC. The IFGC allows unvented appliances that comply with ANSI Z21.11.2. As revised, the IgCC text will require that fireplaces and solid fuel appliances be efficient and minimize building air infiltration, consistent with the original intent.

Unvented room heaters and unvented decorative appliances are listed to the same stringent national product standard, ANSI Z21.11.2. Two primary criteria exist for these products to be considered green: first, their energy efficiency, and second, their impact on indoor air quality.

When considered from a site or point-of-use standpoint, unvented room heaters and invented decorative appliances are more energy efficient than any gas, wood or biomass appliance allowed by the IgCC. When considered from a source or fuel origination standpoint, unvented room heaters and unvented decorative appliances are more energy efficient than any electric appliance allowed by the IgCC. The code should not disallow the most energy efficient supplemental heating products available to architects, contractors, and homeowners.

Unvented room heaters and unvented decorative appliances meet nationally recognized indoor air quality guidelines of the federal government. Compliance of these supplemental heating products with the national guidelines has been repeatedly confirmed by peer-reviewed research of Gas Research Institute, American Gas Association Research, and the renowned Arthur D. Llttle; by Risksciences, a toxicology firm; and, by Wilson Environmental, an indoor air quality firm.

Unvented heaters and unvented decorative appliances are green in considering the key criteria of energy efficiency and indoor air quality. They clearly merit inclusion in the IgCC.

Cost Impact: Will not increase the cost of construction. Unvented gas heating products not only provide users and installers with lower cost of purchase and installation, but also reduced utility bills resulting from energy savings.

GG230-14:804.1-DENTON726