



April 18, 2018

Mr. Brian Worsham
PELLETIER BUILDERS, INC.
138 Main Street
Coventry, CT 06238

Dear Mr. Worsham:

RE: I-05-18 Section C402.4.6 - "Loading Dock Weather Seals"

This is in response to your letter dated March 21, 2018 in which you are seeking a formal interpretation to the following questions.

Background

Section "C402.4.6 Loading Dock Weather Seals" of the International Energy Conservation Code. This section calls for "Cargo doors and loading dock doors shall be equipped with weather seals to restrict infiltration when vehicles are parked in the doorway". The commentary clarifies that the "weather seals help to reduce the amount of infiltration that occurs when a trailer pulls up to unload at an open loading dock door."

Question-1

We were recently notified that PVC strip doors that are designed to reduce the amount of exterior air infiltration at overhead doors are not acceptable methods of achieving the C402.4.6 requirement. Since there are not quantitative requirements listed in the code, we would like to get a clarification on why the PVC strip doors do not meet this requirement?

Answer - 1

Section C402.4.6 of the 2012 International Energy Conservation Code (IECC) portion of the State Building Code states that "Cargo doors and loading dock doors shall be equipped with weather seals to restrict infiltration when vehicles are parked in the doorway". (The language is the same in the 2015 IECC). As such, the above mentioned code would not prohibit the use of the above mentioned product.

Question-2

An owner may need an overhead door for receiving process equipment that is not used for typical shipping/receiving of their produced consumer good or product. Is an overhead door that an owner does not use for the purpose of shipping/receiving of profit creating product exempt from this code such as if the overhead door is used on a very inconsistent basis only to receive new equipment for use in his manufacturing process? If a weather seal is deemed required, would a PVC strip door be an acceptable method of reducing the infiltration at this door that is rarely used? Or would it just be exempt due to the doors use?

Answer-2

Yes. The use of PVC Strips would be acceptable at this door.

Question-3

Certain loading/cargo door applications will utilize side loading. In this application both typical seals and shelters will prohibit the proper truck position and loading of equipment. Also they will not seal the truck as the seals and shelters only work when a trailer box truck is backed into a typical door. In this application would an interior seal such as a loading dock PVC strip doors be an acceptable alternative to reduce the air infiltration when the truck is parked at the door or would it be exempt due to door use?

Answer-3

See Answer Number 1.

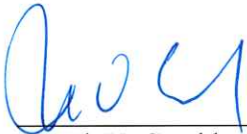
Question-4

Another application where the owner utilizes flat-bed trailers as their typical means of transporting good pose issues with seals/shelters. Both typical exterior seals and shelters are non-functional in this application. Is this another application in which PVC strip doors would be an acceptable option or would it be exempt due to door use?

Answer-4

See Answer Number 1

Sincerely,



Joseph V. Cassidy, P.E.
State Building Inspector

JVC:bags