

**OREGON**  
**Interpretive Ruling No. 93-23**  
**STORM WINDOWS OVER REQUIRED OPENABLE EXIT OR VENTILATION WINDOWS**  
(revised 7-20-99, editorial only)

**REQUESTED BY:** PPPI Manual Review Committee

**QUESTION:** Are storm windows installed for energy conservation over openable egress windows or openable ventilation windows required to be openable?

**APPLICABLE CODE SECTIONS:** 1998 Oregon Structural Specialty Code (OSSC), Section 310.4, 1996 One and Two Family Dwelling Specialty Code (Dwelling Code), Section 310.2

**BACKGROUND:** Building codes were established to protect the life, health, safety and welfare of citizens. Life, health and safety outweigh welfare requirements. Energy conservation measures fall within the welfare category. Due to this lower -priority, when there is a conflict, the energy conservation requirements should give way to the needs of life, health and safety.

Exit windows from bedrooms must not be covered by energy conservation measures which would prevent occupant escape or rescue. Fire marshals are also concerned about plastic films covering these Windows which may retain smoke within the room and require the confused fire victim to "punch his way out of a bag."

The Structural Code Advisory Board ruled on May 23, 1978, storm windows or plastic coverings over, required openable exit or ventilation windows shall provide the same means of exit or ventilation required of the approved window installed in the structural perimeter walls.

**FINDINGS:** The PPPI Manual Review Committee and the Structural Code Advisory Board find the codes may have changed over the years but the concerns for safety have not; therefore, this interpretation is still valid.

This interpretation is authorized by ORS 455.060, Rulings on Acceptability of Materials, Designs or Methods of Construction and Attorney General's Opinion OP-5208 issued October 1, 1981, advising the statute permits authoritative interpretations of existing code requirements.

**DISCUSSION & CONCLUSION:** Storm windows over required openable exit or ventilation windows shall provide the same means of exit or ventilation required of the approved window installed in the exterior walls: Plastic coverings, although not regulated by either code, should also not block required emergency exits.

(signed July 21, 1993)  
John Talbott, Chairman  
Structural Code Advisory Board

The recommendations and findings of the Structural Code Advisory Board are accepted and the conclusions are adopted.

(signed July 30, 1993)  
Michelle J. Patterson for  
Gary J. Wicks, Administrator  
Building Codes Agency