



## 2021 I-Code Q&A

This document provides responses to questions on the transition into the 2021 I-Codes, including the applicable code and related links.

- [General Topics](#)
- [International Residential Code \(IRC\)](#)
- [International Building Code \(IBC\)](#)
- [International Mechanical Code \(IMC\)](#)
- [International Plumbing Code \(IPC\)](#)

We encourage you to submit additional questions through the [online recommendations form](#) for early identification of questions and concerns.

## GENERAL TOPICS

Section	Provision	Question	Response	Related Links		
		Is Pennsylvania on the 2021 IBC?	The 2021 IBC (and other I-Codes) will be adopted throughout the Commonwealth of PA on July 13, 2025. Applications filed with Phila L&I on or after July 13, 2025, may apply the 2018 or 2021 I-Codes AND applications filed on or after January 13, 2026, MUST apply the 2021 I-Codes. These regulations will be published to the PA UCC site and will be advertised in the L&I newsletter.	<a href="#">PA UCC Regulations</a>		
		When will the PA 2021 IBC with amendments be online?	The proposed PA UCC 2021 I-Code modifications are published to UCC Review and Advisory Council page. The PA Dept of Labor and Industry will publish regulations formally adopting the changes prior to the July 13, 2025 implementation date. The unamended 2021 I-Codes may be viewed through ICC website.	<a href="#">PA UCC RAC</a>	<a href="#">PA UCC amendments</a>	<a href="#">ICC Codes</a>
		How will variances granted under the 2018 Code be treated?	An application which received a variance under the 2018 I-Codes must be acted upon to retain the BBS variance. If the application or permit expire and a new application is required under the 2021 I-Code, a new appeal under the 2021 I-Codes must be filed with the BBS. The transition to the 2021 I-Codes has no impact on zoning variances or special exceptions.			
		Will there be a Philadelphia Version of the 2021 IBC that can be purchased from IBC?	The City is working with ICC to develop a Philadelphia Building Code that incorporates state and local amendments. The intent is to publish digital versions to the ICC site, which can be viewed free of charge with additional features available through subscription. PDF versions will be available through the City website and can be downloaded at no charge. Bound, hard copies will not be available.			
		Forms with I-Code references (i.e. special inspections, structural design criteria) will be reissued with reference to 2021 I-Codes. Will it be made clear which form is for 2018 and which is for 2021?	Yes, the forms will be labeled as '2018' or '2021'. Both versions will remain available on our website. The design professional must be careful to submit the version that corresponds to the edition utilized for design.			

## IRC CODE TOPICS

Section	Provision	Question	Response	Related Links		
<a href="#">R-310.1</a>	If an emergency escape and rescue does not open directly into a public way, the alley must be a minimum of 36". Under the PA UCC, there will be an exception that allows for the reduction of the alley to 30" if 1) it is an infill lot 2) it is a shared easement 3) the building is sprinklered and 4) the yard is a minimum of 80 sq ft.	How would the 36/30" alley issue be addressed for existing deeded shared alleys? I'm referring to new construction. We see a lot of those in Philly. If a shared deeded alley is 30" wide, 15" on each side, does this mean you could design the building with the 15" alley on just your property provided there is an 80sf rear yard?	Yes. The minimum 30" is the total width of the shared easement. As long as the property owner has legal rights to the easement, the portion of the easement on each property is not a factor.	<a href="#">ICC R-310.1</a>	<a href="#">PA UCC amendments -(PG 22)</a>	
<a href="#">E-3601.8</a>	One- and two-family dwellings require an emergency disconnect in a readily accessible outdoor location. Under the PA UCC, this requirement will be limited to detached one- or two-family dwellings governed by the IRC.	Please define semi detached building regarding emergency electrical disconnect. Under the PA UCC, this will be limited to detached one- and two-family dwellings.	<p>A detached two-family dwelling governed by the IRC, is most commonly referred to as a semi-detached (a building with one side building wall located on or at one side lot line and the opposite side building wall not located on or at the opposite side lot line) or twin home in Philadelphia. Most traditional duplexes are regulated under the IBC.</p> <p>Important Note: The requirement for an outside service disconnect for all one- and two-family dwellings is also required under Section 230.85 of NEC-20. One-and two-family dwellings regulated under the IBC (all single family dwellings more than 3 stories and duplexes) require an outdoor disconnect. The exception for attached and semi-detached buildings under the IRC does not apply.</p>	<a href="#">ICC IRC E-3601.8</a>	<a href="#">PA UCC amendments -(PG 51)</a>	<a href="#">FAQ: What Code Applies to Electrical Work?</a>

## IBC CODE TOPICS

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<p><b>B-704.4</b></p>	<p>Where secondary structural members are required to be fire-resistance rated, the rating must be achieved by enclosing the individual member. This section includes an exception for studs and columns in light-frame construction that considers them part of the wall assembly rather than as individual members. Under the PA UCC, the exception for columns is eliminated and they require encasement.</p>	<p>What is the proposed change relating to light frame construction.</p>	<p>This is not a change to the PA UCC as it was included in both the 2015 and 2018 editions. However, the requirement to encase qualifying columns is a change within the City of Philadelphia because those prior amendments did not apply (due to our independent adoption of the 2018 IBC).</p>	<p><a href="#">ICC B-704.4</a></p>	<p><a href="#">PA UCC amendments- (PG 4)</a></p>	

## IMC CODE TOPICS

Section	Provision	Question	Response	Related Links
<a href="#">Ch. 11</a>	The allowance of A2L refrigerants is very limited under the 2021 IMC, although A2Ls are becoming increasingly prevalent in HVAC equipment as HFCs are phased down under the 2020 AIM Act. The 2024 IMC allows for more expansive use of A2Ls, with specific limits and safety requirements. The ICC recommends that current codes are amended to incorporate these provisions and provides guidance on required updates.	Will refrigerant shafts be required for A2L refrigerants even though that requirement will be lifted by future codes?	The City is seeking the changes that are recommended by the ICC. These changes do incorporate 2024 provisions; however, the 2021 requirement to provide a rated shaft enclosure for refrigerant piping penetrating more than two floors remains in Section 1109.2.5 of the 2024 IMC. Note: Adoption of these changes is contingent upon PA Dept of Labor and Industry's concurrence that they meet or exceed the 2021 PA UCC and an ordinance of City Council. Stay tuned for status updates.	<a href="#">ICC M21-Ch 11</a> <a href="#">ICC IMC Recommended Changes</a>

## IPC CODE TOPICS

Section	Provision	Question	Response	Related Links
<a href="#">717 and 718 (to be renumbered under Phila Plumbing Code)</a>	Provisions have been added to allow non-invasive methods of building sewer repair, which include the submission of pre and post-installation video surveys. Note: Philadelphia is seeking local amendments to limit to building sewers for one- and two-family dwellings.	Will the pre/post video survey apply to lateral seal permits?	No, this requirement only applies to the trenchless repair techniques described in Sections 716-718.	<a href="#">Proposed Phila Amendments</a>