

**MINUTES OF THE NORTH CAROLINA BUILDING CODE COUNCIL
SEPTEMBER 10, 2002 MEETING
RALEIGH, NORTH CAROLINA**

All Council members were present with the exception of Dan Murray, Gary York, and Tim Reynolds.

THESE ARE SUMMARY MINUTES AND THE OFFICIAL MINUTES OF THIS MEETING ARE RECORDED ON TAPE. ANYONE DESIRING VERBATIM OR EXCERPTS FROM THESE TAPES SHOULD CONTACT THE ENGINEERING DIVISION, NC DEPARTMENT OF INSURANCE FOR INFORMATION ON REPRODUCTION COSTS.

Chairman Gardner called the meeting to order. Chairman Gardner announced there will be a work session at 1:00PM on December 9, 2002, and the meeting will be at 9:00 AM on December 10, 2002 at the Wake County Commons located at 4011 Cary Drive, Raleigh, NC 27610.

The following items were considered:

ITEM 1 - APPROVAL OF THE MINUTES OF THE JUNE 11, 2002, BUILDING CODE COUNCIL MEETING.

Tom Avery made a motion to approve the minutes. Aubrey Smith seconded the motion and motion carried.

ITEM 2 - APPEAL BY GILBERT STANLEY OF AN INTERPRETATION FROM GROVER SAWYER ON THE RULING OF THE RESIDENTIAL CODE SECTION 108 ALTERNATE MATERIALS AND SYSTEMS.

Chairman Gardner asked Diane Miller with the Attorney General's office to explain the procedures of this appeal. Ms. Miller stated the issue of the appeal is whether Mr. Sawyer correctly interpreted the Building Code. Mr. Sawyer's interpretation is that the use of a paint on the interior wall of a residence in lieu of a vapor barrier in the wall is an alternate design and therefore subject to section 108 of the Residential Code.

Mr. Stanley explained the history of his appeal. Mr. Stanley is concerned about mold that has occurred in 2 modular homes which were built less than 3 years ago. Mr. Stanley's main concern is that he believes that homes painted with the approved vapor barrier paint are not equivalent to homes with a vapor barrier in the wall.

Grover Sawyer, Department of Insurance, stated that the use of the paint in lieu of the vapor barrier was approved as an alternate material. Mr. Sawyer stated that alternate methods and materials for modular homes are approved by third party testing agencies as an alternate. Mr. Sawyer stated that PFS is the 3rd party agency in this case, and they have been approved by the Building Code Council to perform testing.

Mr. Stanley stated that his request for an interpretation was not for modular homes, but for any home constructed under the NC Residential Code. Mr. Sawyer stated he would re-write his interpretation letter to address any home constructed under the NC Residential Code.

At the December meeting the Council stated they would like to look more closely at the criteria PFS used to approve the paint.

Mr. Turner made a motion to table the subject until the December meeting. Marshall Knight seconded the motion and the motion carried unanimously.

ITEM 3 - APPEAL BY KEVIN W. BROCK OF REECE, NOLAND & MCELRATH, INC. OF THE REQUIREMENT FOR THE INCLUSION OF UL-LISTED DETAILS ON DESIGN DRAWINGS.

Barry Gupton, Department of Insurance, stated this is not an appeal, since the appeal concerns DOI policy rather than interpretation of a specific code section. The issue is whether DOI may require rated assembly details on drawings and whether copying the details violates the engineering statutes. Mr. Gupton checked with the Licensing Board for Engineers and Land Surveyors who indicated that putting the details on the drawings does not violate any engineering statutes.

Richard Strickland made a motion to support the staff of the DOI in requesting design details on drawings. Brad Lail seconded the motion and the motion carried unanimously.

ITEM 4 - REQUEST BY THE CITY OF FAYETTEVILLE FOR AUTHORITY TO REVIEW PLANS AND SPECIFICATIONS FOR BUILDINGS AS LISTED IN TABLE 502 OF THE 2002 NORTH CAROLINA ADMINISTRATION AND ENFORCEMENT CODE.

Dan Tingen made a motion to approve. Jack Neel seconded the motion and the motion carried.

ITEM 5 - REQUEST BY DURHAM CITY-COUNTY FOR AUTHORITY TO REVIEW PLANS AND SPECIFICATIONS FOR BUILDINGS AS LISTED IN TABLE 502 OF NORTH CAROLINA ADMINISTRATION AND ENFORCEMENT CODE.

Richard Strickland made a motion to approve. Aubrey Smith seconded the motion and the motion carried.

PETITIONS FOR RULEMAKING

Wanda Edwards reviewed the procedure for petitions for rulemaking. Items 6 and 7 have been proposed for code changes. The Council will vote to approve or deny the petitions. Petitions that are granted may proceed through the rulemaking process. The Council will give no further consideration to petitions that are denied. The Council may send any petition to the appropriate Building Code Council Committee for review. The public hearing for petitions granted at the September meeting will be held on March 10, 2003.

ITEM 6 - REQUEST BY F. REED JARVIS OF NC FIRE SERVICE CODE REVISION COMMITTEE TO REVISE SECTION 907.2.3 OF THE NORTH CAROLINA FIRE PREVENTION CODE AS FOLLOWS:

Exceptions:

1. ~~Deleted.~~ Group E occupancies with an occupant load of less than 50.

Alan Perdue, representing the NC Fire Service Code Revision Committee, spoke in favor of the petition. Aubrey Smith stated this proposed change would apply in the North Carolina Building Code as well.

Aubrey Smith made a motion to approve. Brad Lail seconded the motion and the motion carried.

ITEM 7 - REQUEST BY TIM LAUGHLIN OF NC PETROLEUM MARKETERS ASSOCIATION TO REPLACE SECTION 2206.2.3, # 2 OF THE NORTH CAROLINA FIRE PREVENTION CODE AS FOLLOWS:

2. Fleet Vehicle Service Stations:
When approved by the code official, aboveground storage tanks, 1,100 gallons or less in capacity, may be used to store Class I liquids at fleet vehicle service stations in accordance with NFPA 30A.

Renumber the remaining numbers.

Mr. Tim Laughlin of NC Petroleum Marketers Association urged the Council to approve this item. Richard Strickland stated the Fire Code Revision Committee is in support of this item.

Richard Strickland made a motion to approve. Al Bass seconded the motion and the motion carried.

PUBLIC HEARING AND FINAL ADOPTION

Wanda Edwards reviewed the procedure for the public hearing and for final adoption. Items 8 through 12 are for final action by the Council. A Public Hearing was held September 9, 2002, for the public to provide comments concerning the proposals. Items approved by the Council will go to the Rules Review Commission before its' October meeting. The Council will give no further consider to items that are denied. Upon approval by the Rules Review Commission the rules will await possible action by the NC Legislature.

ITEM 8 - PROPOSAL BY THE NC BUILDING INSPECTORS' ASSOCIATION TO REVISE NORTH CAROLINA BUILDING CODE SECTION 302.3.3 EXCEPTION 2 AS FOLLOWS:

The private garage in Group R-3 occupancies shall be separated from the residence and its attic area by means of minimum ½ inch (12.7 mm) gypsum board applied to the garage side. Door openings between the garage and the residence shall be equipped with either solid wood doors not less than 1-3/8 inches (35 mm) thick, solid or honeycomb core steel doors not less than 1-3/8 inches (35 mm) thick or doors in compliance with Section 714.2.3. Openings from a private garage directly into a room used for sleeping purposes shall not be permitted.

Aubrey Smith made a motion to approve. Al Bass seconded the motion, and the motion carried.

ITEM 9 - REQUEST FROM THE FIRE PREVENTION COMMITTEE TO REVISE THE NORTH CAROLINA FIRE PREVENTION CODE AND THE NORTH CAROLINA BUILDING CODE SECTION 903.2.1.3 AS FOLLOWS:

903.2.1.3 Group A-3. An automatic sprinkler system shall be provided for Group A-3 occupancies where one of the following conditions exists:

1. The fire area exceeds 12,000 square feet (1115 m²).
2. The fire area has an occupant load of 300 or more.

Exceptions:

1. This requirement shall not apply to assembly occupancies used primarily for worship with fixed seating and part of a separated use.
 2. This requirement shall not apply to assembly occupancies used primarily for worship consisting of a single multipurpose room that are not used for exhibition or display and are part of a separated use.
3. The fire area is located on a floor other than the level of exit discharge.

Richard Strickland made a motion to approve this item with corrections from the errata sheet as printed above. Barry Maness seconded the motion and motion was approved.

ITEM 10 – REQUEST BY DANIEL GLEIBERMAN OF FALCON WATERFREE TECHNOLOGIES TO REVISE THE NORTH CAROLINA PLUMBING CODE SECTIONS 419 AND 425 AS FOLLOWS:

419.1 Approval. Urinals shall conform to ASME 112.19.2, CSA B45.1 or CSA B45.5. Urinals shall conform to the water consumption requirements of Section 604.4. Urinals shall conform to the hydraulic performance requirements of ASME 112.19.6, CSA B45.1 or CSA B45.5.

Urinals that do not use water shall be permitted provided the urinals

1. provide a barrier liquid sealant contained in a removable trap to maintain the trap seal;
2. permit the uninhibited flow of water through the trap to the sanitary drainage system;
3. comply with ANSI Z124.9 and ASME 112.19.2, as applicable,

425. Flushing devices required. Each water closet, urinal, clinical sink, and any plumbing fixture that depends on trap siphonage to discharge the fixture contents to the drainage system shall be provided with a flushometer valve, flushometer tank or a flush tank designed and installed to supply water in quantity and rate of flow to flush the contents of the fixture, cleanse the fixture, and refill the fixture trap.

A flushometer valve, flush tank, or similar device shall not be required for urinal fixtures that comply with the waterless test requirements of ANSI Z124.9 and which:

1. provide a barrier liquid sealant contained in a removable trap to maintain the trap seal;
2. permit the uninhibited flow of water through the trap to the sanitary drainage system;
3. comply with ANSI Z124.9 and ASME 112.19.2 as applicable, and

Al Bass stated that the Plumbing Code Committee recommends approval this item, with the deletion of item (4) under section 425, as shown on the agenda.

Al Bass made a motion to approve. Barry Maness seconded the motion and the motion carried.

ITEM 11 – PROPOSAL BY NANETTE McELMAN OF IBHS TO INCLUDE WINDBORNE DEBRIS PROTECTION IN THE 2002 NC BUILDING CODE AS PRINTED IN SECTION 1609.1.4, TABLE 1609.1.4 AND SECTION 1609.2 OF THE 2000 INTERNATIONAL BUILDING CODE.

Dan Tingen asked how this revision would appear in the code. Wanda Edwards stated Section 1609.1.4; Table 1609.1.4 and Section 1609.2 would be put back in the code. A sentence will be added stating that the provisions of the windborne debris protection shall apply to structures built in North Carolina within 1500 feet of the mean high water level. Tom Avery recommended that the definition be changed in Section 1609.2 to state windborne debris protection shall apply within 1500 feet of the mean high water level.

Dan Tingen made a motion to approve this proposal. Tom Avery seconded the motion and motion carried.

ITEM 12 – PROPOSAL BY NANETTE McELMAN OF IBHS TO INCLUDE WINDBORNE DEBRIS PROTECTION IN THE 2002 NC RESIDENTIAL CODE AS PRINTED IN SECTION R301.2.1.2, TABLE R301.2.1.2 AND SECTIONS R613.4 AND R613.7 OF THE 2000 INTERNATIONAL RESIDENTIAL CODE.

Tom Avery recommended that the definition be changed in Section R202 to define the scope of the windborne debris protection requirements.

Dan Tingen made a motion to approve the proposal. Marshall Knight seconded the motion and the motion carried.

ITEM 13 – REPORT FROM THE MOISTURE AD HOC COMMITTEE.

Dan Tingen gave the report from the Moisture Ad Hoc Committee, and stated that the Committee is working on preparing recommendations to present to the Council at the December meeting.

ITEM 14 – REPORT FROM THE PLUMBING AD HOC COMMITTEE.

John Hitch gave the report from the Plumbing Ad Hoc Committee, and stated that the Committee is continuing its work and may have recommendations for the Council at the December meeting.

ITEM 15 – RECOMMENDATIONS FROM THE ADMINISTRATIVE COMMITTEE.

Chairman Barry Gardner stated the Committee has met twice. The Committee recommends that the work session for the Building Code Council quarterly meetings begin at 8:00 am on Monday, the Committee meetings begin at 9:00 am, and the public hearings begin at 1:00 pm. The Committee recommends that the Council meeting begin at 9:00 am on Tuesday morning. The Committee will meet again to discuss a few other items.

Mr. Aubrey Smith made a motion to approve the committee decision. Richard Strickland seconded the motion, and the motion carried.

ITEM 16 – REPORT FROM THE BUILDING CODE COMMENTARY AD HOC COMMITTEES.

Aubrey Smith stated that the committee working on Volume 1 of the NC Building Code commentary has completed its work. The Committee will wait for the Fire Prevention Ad Hoc Committee to write the commentary for Chapter 9. After the commentary is complete for Chapter 9, the Building Code Commentary Ad Hoc Committee will meet again and review the entire commentary before sending the book to the publisher.

Tom Avery stated the Ad Hoc Committee is continuing to work on Volume 2 of the NC Building Code Commentary.

Wanda Edwards stated the Plumbing and Mechanical Commentaries are currently available. The staff will check with SBCCI on the projected completion dates of the other commentaries.

ITEM 17 – OTHER ITEMS

AREA INCREASE FOR R-2 OCCUPANCIES WITH THE USE OF 13R SPRINKLERS.

Richard Strickland reported that the Fire Prevention Ad Hoc Committee met to study the provision in the 1999 version of the Building Code that allowed an area increase for R-2 occupancies with the use of 13R sprinklers. The 2002 NC Building Code does not allow the area increase. The Committee decided to wait one year after the code becomes mandatory in January 2003, and re-evaluate the provision based on trends that develop after the new code is mandatory.

REQUIREMENT IN APPENDIX A OF THE NC ADMINISTRATIVE AND ENFORCEMENT REQUIREMENTS CODE FOR SIGNATURES ON PERMIT APPLICATIONS.

Wanda Edwards stated a request had been received from Wake County Inspections for clarification about signatures being required on permit applications. The staff stated the statutes do not require a signature on the permit application. However, Appendix A of the Administration and Enforcement Requirements Code shows a signature on the sample permit application. The Chairman referred the matter to the Administrative Committee for further review.

REQUEST BY DAN TINGEN TO RECEIVE COPIES OF LETTERS OF INTERPRETATION OF THE NC RESIDENTIAL CODE.

Dan Tingen requested the staff send copies of letters of interpretation to him. The staff responded they would forward copies of letters of interpretations of the Residential Code to Mr. Tingen.

There being no further items for discussion, Al Bass made a motion to adjourn. The motion was seconded and the motion carried.

Sincerely,

Wanda D. Edwards, PE
Secretary

wde/jg

PETITIONS ADOPTED BY THE NC BUILDING CODE COUNCIL

The following proposed rules have been adopted by the Building Code Council, and will be forwarded to the NC Rules Review Commission for approval. Upon approval by the Rules Review Commission, the rules await possible action by the Legislature in next year's session.

NOTE: These proposed rules are not effective until January 1 of the year following approval by the Rules Review Commission and Legislative approval.

THE FOLLOWING ARE PROPOSED RULES CHANGES TO THE
NORTH CAROLINA BUILDING CODE

302.3.3 Separated uses. Each portion of the building shall be individually classified as to use and shall be completely separated from adjacent areas by fire barrier walls or horizontal assemblies or both having a fire-resistance rating determined in accordance with Table 302.3.3 for the uses being separated. Each fire area shall comply with the code based on the use of that space. Each fire area shall comply with the height limitations based on the use of the space and the type of construction classification. In each story, the building area shall be such that the sum of the ratios of the floor area of each use divided by the allowable area for each use shall not exceed 1.

Exceptions:

1. Except for Group H and I-2 areas, where the building is equipped throughout with an automatic sprinkler system, the fire-resistance ratings in Table 302.3.3 shall be reduced by 1 hour but to not less than 1 hour and to not less than that required for floor construction according to the type of construction
2. The private garages in R-3 occupancies shall be separated from the residence and its attic area by means of minimum ½-inch (12.7 mm) gypsum board applied to the garage side. Door openings between the garage and the residence shall be equipped with either solid wood doors not less than 1-3/8 inches (35 mm) thick, solid or honeycomb core steel doors not less than 1-3/8 inches (35 mm) thick or doors in compliance with Section 714.2.3. Openings from a private garage directly into a room used for sleeping purposes shall not be permitted.
3. Ducts in the garage and ducts penetrating the walls or ceilings separating the dwelling from the garage shall be constructed of a minimum No. 26 gage (0.48 mm) sheet steel and shall have not openings into the garage.
4. A separation is not required between a Group R-3 and Group U carport provided the carport is entirely open on two or more sides and there are not enclosed uses above.

THE FOLLOWING RULE CHANGE IS PROPOSED FOR THE NC FIRE PREVENTION CODE
AND THE NC BUILDING CODE

903.2.1.3 Group A-3. An automatic sprinkler system shall be provided for Group A-3 occupancies where one of the following conditions exists:

1. The fire area exceeds 12,000 square feet (1115 m²).
2. The fire area has an occupant load of 300 or more.

Exceptions:

1. This requirement shall not apply to assembly occupancies used primarily for worship with fixed seating and part of a separated use.
2. This requirement shall not apply to assembly occupancies used primarily for worship consisting of a single multipurpose room that are not used for exhibition or display and are part of a separated use.
3. The fire area is located on a floor other than the level of exit discharge.

*****The following sections and table will be added in its entirety.*****

1609.1.4 Protection of openings. In wind-borne debris regions, glazing in the lower 60 feet (18 288 mm) in buildings shall be assumed to be openings unless such glazing is impact resistant or protected with an impact-resistant covering meeting the requirements of an approved impact-resisting standard or ASTM E 1996 and of ASTM E 1886 referenced therein as follows:

1. Glazed openings located within 30 feet (9144 mm) of grade shall meet the requirements of the Large Missile Test of ASTM E 1996.
2. Glazed openings located more than 30 feet (9144 mm) above grade shall meet the provisions of the Small Missile Test of ASTM E 1996.

Exception: Wood structural panels with a minimum thickness of 7/16 inch (11.1 mm) and maximum panel span of 8 feet (2438 mm) are permitted for opening protection in one-and two-story buildings. Panels shall be precut to cover the glazed openings with attachment hardware provided. Attachments shall be designed to resist the components and cladding loads determined in accordance with the provisions of Section 1609.6.5. Attachment in accordance with Table 1609.1.4 is permitted for buildings with a mean roof height 33 feet (10 058 mm) or less where wind speeds (3-second gust) do not exceed 130 miles per hour.

TABLE 1609.1.4
WINDBORN DEBRIS PROTECTION FASTENING SCHEDULE
FOR WOOD STRUCTURAL PANELS ^{a,b,c}

| FASTENER TYPE | FASTENER SPACING (inches) | | | |
|--------------------------|---------------------------|------------------------------------|------------------------------------|----------------------------------|
| | Panel span ≤ 2 feet | 2 feet < Panel span ≤ 4 feet | 4 feet < Panel span ≤ 6 feet | 6 feet Panel span ≤ 8 feet |
| 2-1/2" #6 Wood Screws | 16 | 16 | 12 | 9 |
| 2-1/2" #8 Wood Screws | 16 | 16 | 16 | 12 |

For SI: 1 inch = 25.4 mm, 1 foot = 304.8mm, 1 pound = 0.454 kg
1 mile per hour = 0.44 m/s

- a. This table is based on a maximum wind speed (3 second gust) of 130 mph and mean roof height of 33 feet or less.
- b. Fasteners shall be installed at opposing ends of the wood structural panel.
- c. Where screws are attached to masonry or masonry/stucco, they shall be attached utilizing vibration-resistant anchors having a minimum withdrawal capacity of 490 pounds.

1609.2 Definitions. The following words and terms shall, for the purposes of Section 1609.6, have the meanings shown herein.

WIND-BORNE DEBRIS REGION. Areas within hurricane-prone regions within 1500 feet (0.4572 km) of the mean high water line of the Atlantic Ocean.

THE FOLLOWING ARE PROPOSED RULES CHANGES TO THE
NORTH CAROLINA PLUMBING CODE

419.1 Approval. Urinals shall conform to ASME 112.19.2, CSA B45.1 or CSA B45.5. Urinals shall conform to the water consumption requirements of Section 604.4. Urinals shall conform to the hydraulic performance requirements of ASME 112.19.6, CSA B45.1 or CSA B45.5.

Urinals that do not use water shall be permitted provided the urinals

1. provide a barrier liquid sealant contained in a removable trap to maintain the trap seal;
2. permit the uninhibited flow of water through the trap to the sanitary drainage system;
3. comply with ANSI Z124.9 and ASME 112.19.2, as applicable.

425. Flushing devices required. Each water closet, urinal, clinical sink, and any plumbing fixture that depends on trap siphonage to discharge the fixture contents to the drainage system shall be provided with a flushometer valve, flushometer tank or a flush tank designed and installed to supply water in quantity and rate of flow to flush the contents of the fixture, cleanse the fixture, and refill the fixture trap.

A comply with the waterless test requirements of ANSI Z124.9 and which:flushometer valve, flush tank, or similar device shall not be required for urinal fixtures that

1. provide a barrier liquid sealant contained in a removable trap to maintain the trap seal;
2. permit the uninhibited flow of water through the trap to the sanitary drainage system;
3. comply with ANSI Z124.9 and ASME 112.19.2 as applicable, and

THE FOLLOWING ARE PROPOSED RULES CHANGES TO THE
NORTH CAROLINA RESIDENTIAL CODE

*****The following sections and table will be added in its entirety.

R202 Definitions. WINDBORNE DEBRIS REGION. Areas within hurricane-prone regions within 1500 feet (0.452 km) of the mean high water line of the Atlantic Ocean.

R 301.2.1.2 Internal pressure. Windows in building located in windborne debris regions shall have glazed openings protected from windborne debris or the building shall be designed as a partially enclosed building in accordance with the North Carolina Building Code. Glazed opening protection for windborne debris shall meet the requirements of the Large Missile Test of ASTM # 1996 and of ASTM # 1886 reference therein.

Exception: Wood structural panels with a minimum thickness of 7/16 inch (11.1 mm) and a maximum span of 8 feet (2438 mm) shall be permitted for opening protection in

one- and two-family buildings. Panels shall be precut to cover the glazed openings with attachment hardware provided. Attachments shall be provided in accordance with Table R301.2.1.2 or shall be designed to resist the components and cladding loads determined in accordance with the provisions of the North Carolina Building Code.

TABLE R301.2.1.2
WINDBORNE DEBRIS PROTECTION FASTENING SCHEDULE
FOR WOOD STRUCTURAL PANELS ^{a,b,c,d}

| FASTENER TYPE | FASTENER SPACING | | | |
|-----------------------|------------------------|----------------------------------|---------------------------------|---------------------------------|
| | Panel Span ≤ 2 feet | 2 feet <= Panel Span ≤ 4 feet | 4 feet < Panel span ≤ 6 feet | 6 feet < Panel span ≤ 8 feet |
| 2-1/2" #6 wood screws | 16 | 16 | 12 | 9 |
| 2-1/2" #8 Wood Screws | 16 | 16 | 16 | 12 |

For SI: 1 inch = 25.4 mm, 1 foot = 304.8 mm, 1 pound = 0.454 kg
1 mile per hour = 0.44 m/s

- a. This table is based on a maximum wind speed (3 second gust) of 130 mph and mean roof height of 33 feet or less.
- b. Fasteners shall be installed at opposing ends of the wood structural panel.
- c. Where screws are attached to masonry or masonry/stucco, they shall be attached utilizing vibration-resistant anchors having a minimum withdrawal capacity of 490 pounds.

MEMO

Date: September 25, 2002

To: Code Enforcement Officials
Other Interested Parties

From: Barry Gupton, P.E.
Staff, Chief Building Code Consultant

Re: Egress Door Latching/Locking Hardware

An excellent video and publication “Critical Incident Response” has been distributed to local schools, law enforcement and emergency responders by the Attorney General’s office. It contains much useful information about how to respond to crisis on the school campus. It has, however, raised some concern with DPI/OSP and DOI/OSFM in regard to installing new or additional locks or deadbolts on egress doors. We urge you to notify your local school officials that the local Code Enforcement Official needs to be consulted prior to installing any locks on egress doors. For compliance with the North Carolina State Building Code, only single-operation latching/locking devices that are operable from the occupied side of the door are permitted on egress doors.

One example shown in the video is a “lever-handled” classroom lockset, key-locked from the corridor side, and is an appropriate combination latching/locking device. Two additional examples show secondary “thumb-turn” locks. These devices may not be installed either by themselves or in addition to the primary classroom lockset device. While not shown in the video, it is worthwhile to note that manually operated flush bolts or surface bolts are prohibited on egress doors.