



## CITY OF MILPITAS

Office of Building Safety  
455 E. Calaveras Blvd.  
Milpitas, CA 95035  
408-586-3240  
[www.milpitas.gov](http://www.milpitas.gov)

### HAZARDOUS MATERIALS CONTROL AREAS IN EXISTING BUILDINGS

**Policy:****BDP-BLG22**

Effective Date:

7/1/2008

Proposed by:

TUCC

Last Reviewed/  
Revised:

3/6/2023

Reviewed/  
Revised by:

JDS

Approved By:

Building Official

**CODE REFERENCE:**

2022 CBC 414.2, Table 414.2.2

**ISSUES:**

2022 CBC requirements for hazardous materials control areas are very different from 97 UBC. UBC allowed 4 control areas per building. Such control areas could be both vertical and horizontal within the building. Required 1-hour occupancy separation between control areas. Each control area was allowed up to 100% of the Exempt Table quantities. Control areas were permitted to span through floors.

2022 CBC is based upon a set number of control areas per floor level. Four control areas are permitted on the first floor and three on the second floor. The number of control areas permitted on floors continues to reduce as you go higher in the building. The maximum allowable quantities of hazardous materials per control area are reduced as the floor level under consideration increases in stories. Two-hour horizontal separation is required for the floors of each story. At the fourth story, the vertical separation between control areas also increases to 2-hours. There is an exception for fully fire-sprinklered buildings to have 1-hour floors up through the third story. Control areas can no longer span floors.

For TI remodeling within existing buildings, it is very difficult to change floor separations to 2 hours should the building not already have 1-hr floors. Likewise, it is difficult to provide 2-hour floors at the fourth floor and above should the existing building have 1-hour floors. The supporting floor members must have the same rating as is required for the floor. The prorating of the percentage of hazardous materials by floor levels results in an existing control area above the first floor becoming non-compliant to the current code.

**POLICY:**

1. For existing control areas approved prior to Jan. 1, 2011, existing amount and use will be allowed to continue based on the previous approval when no modification is being proposed.
2. For modification or alteration to existing control areas, including TI alteration:
  - If the total number of control areas for the entire multi-story building does not exceed four, the 2-hour horizontal separation would not be required between floors.
  - If there is one control area for the entire building, but the existing control area is above the first-floor level, the 2-hour horizontal separation between floors would not be required.
  - If the existing building has two or more control areas and additional control areas are needed, the total number of control areas within the building could not exceed four.
  - Existing control areas that span floors would be allowed to remain and any additional control areas added could also span floors. Total number of control areas per building could not exceed four.