

**OFFICE OF THE STATE FIRE MARSHAL  
STATE OF ILLINOIS**

Statute, Rule or Standard Policy Interpretation:     **Use of Bulkhead Openings and Doors**

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Title:                     Fire Prevention and Safety  
Part:                     41 Ill. Adm. Code 100  
Section Number:        100.7(b)  
Section Title:           Modifications to the Life Safety Code  
Policy Number:         01-FP-2010

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**Purpose:**                This instruction provides for current policy and guidance to ensure uniform enforcement of the 2000 edition of the National Fire Protection Association’s *Life Safety Code* and specifically for the interpretation of the use of bulkhead style openings and bulkhead doors for egress and escape purposes.

**Scope:**                Statewide

**Explanation:**        What is a Bulkhead Door?  
A bulkhead door for purposes of this document is referring to a type of door assembly covering an opening in the ground that provides direct access to a structure’s basement or lower level. Bulkhead doors typically consist of a single rigid leaf or two overlapping rigid leaves or covers which need to be pushed or lifted upwards in order to be opened. A person, after opening the door, can walk up a series of steps to escape to the outside.

Examples of bulkhead doors are shown in the photos below:



**Current Code:**        The 2000 ed. of the NFPA Life Safety Code is unclear relative to the use of bulkhead style openings and bulkhead doors for egress or escape from an occupancy. Bulkhead doors are simply not specifically mentioned in the Code. Owners and inspectors are confused relative to the applicability of LSC requirements for doors to be “side-hinged” or “swinging” when applied to doors in a bulkhead.

**Policy:  
Interpretation**

**Bulkhead enclosures and bulkhead doors are allowed to be used in accordance with the conditions prescribed in the 2009 *Life Safety Code* Section 24.2.7.2 which limits the use of a bulkhead stairway and/or bulkhead door only to a secondary means of escape.**

**Reason:**

The Office of the Illinois State Fire Marshal has considered the following information in formulating a policy pertaining to this issue:

Bulkhead doors are now addressed in the 2009 edition of the *Life Safety Code* in the One- and Two-Family Dwelling Chapter:

24.2.7.2 Bulkhead Enclosure Stairways.

*Stairways serving bulkhead enclosures that are not part of the required primary means of escape, and that provide access from the outside finished ground level to the basement, shall be exempt from the provisions of 24.2.5.1 when the maximum height from the basement finished floor level to the finished ground level adjacent to the stairway does not exceed 8 ft and the finished ground level opening to the stairway is covered by a bulkhead enclosure with hinged doors or other approved means.*

Therefore, the LSC now recognizes and allows the use of bulkhead stair enclosures and bulkhead doors as long as they are not part of the primary means of escape. Also, the reference in the above LSC language that exempts bulkhead doors from the provision of Section 24.2.5.1 results in the bulkhead stair enclosures not being subjected to the Code's typical hand rail, guard and riser/tread dimension requirements.

The means of escape requirements of Chapter 24 of the *LSC* are referenced by the home day care chapter requirements of the Code. Therefore, what is allowed by Chapter 24 for One- and Two-Family Dwellings is allowed for home day care occupancies.

Also, bulkhead doors are recognized by the International Code Council's (ICC) *International Residential Code* (IRC) for use in residential occupancies in basements with habitable spaces and sleeping rooms. A bulkhead is not limited to use as a secondary means of escape. Essentially, the IRC is very similar to the 2009 LSC in allowing bulkhead enclosures in One- and Two-Family Dwellings, including those that may be used for home day care purposes, when the bulkhead enclosure provides direct access to the basement. The IRC establishes minimum net clear opening requirements as well as other provisions for bulkhead installation.

**Effective Date:**

June 2010