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## ANALYSIS OF NEW CODE (2009 IRC) SECTION R302.13

The following is the specific code section from the 2009 IRC:

**R302.13 Combustible insulation clearance.** Combustible insulation shall be separated a minimum of 3 inches (76 mm) from recessed luminaires, fan motors and other heat-producing devices.

**Exception:** Where heat-producing devices are listed for lesser clearances, combustible insulation complying with the listing requirements shall be separated in accordance with the conditions stipulated in the listing. Recessed luminaires installed in the building thermal envelope shall meet the requirements of Section N1102.4.5. *This red-underlined section is the "model code" Energy section (which Oregon does not adopt).*

**Recommendation:** Delete this entire section as it is not defined well enough and could easily cause unsafe conditions, especially in existing buildings where insulation is being retrofitted.