



**Date: 8/19/21**

**Building Services – Chief Building Official code interpretation:**

The following is a building code interpretation by the Chief Building Official explaining the intent and requirement of a specific code section that is not entirely clear and not concisely explained in the code.

Issue:

Per IBC section 2902 and IPC section 410 a drinking fountain is required for public/commercial spaces with occupants loads of more than 15. The intent of this section is to provide drinking water to all occupants. Due to the Covid pandemic many people are concerned about the sanitary risks of using a traditional open spout drinking fountain and are requesting to use water bottle fillers (without a drinking spout).

1. The bottle filler must be a permanent installed fixture that is connected to the cold-water system of the building. The water activation must be a touch-free sensor or lever that meets the accessible 48" reach range of ICC A117.1.
2. The bottle filler must be located such that all occupants have access at all times the building is occupied.
3. This fixture must be listed and approved per section IPC 410.
4. A portable water dispensing service (Deep Rock) does not meet the requirements described here because the service can be discontinued by the tenant/owner at any time without Building Services knowledge.

Conclusion: A water bottle filling fixture that meets the above conditions does meet the intent of the code requirements listed above and per IBC 104.11 they are approved as an alternate to the traditional open spout drinking fountains.

Russ Howland  
Interim Chief Building Official  
Building Services  
City of Fort Collins

*Russ Howland*

**REDACTED**

**This interpretation is no longer**

**valid as of 4/24/2022**

**Per Chief Building Official,  
Marcus Coldiron**