

**NC Department of Insurance  
Office of the State Fire Marshal - Engineering Division  
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**Make-Up Air to Gang Toilet Rooms**

**Code:** 2018 Mechanical Code

**Date:** May 2, 2019

**Section:** 403.2.2, 501.2, 601.2

**Question:**

Must gang toilet rooms in commercial buildings be provided directly with outdoor air for make-up of required exhaust air?

**Answer:**

No, Section 501.4 requires that the supply air be approximately equal to the exhaust air, but Section 403.2.2 describes the allowed use of air from one space to be transferred to another space to be allowed as makeup for exhausted air in said space. Following the limitations set forth in Section 403.2.2 and 601.2, the use of makeup air from a space other than the bathroom is allowed (transfer air). In effect, the required ventilation air replaces the transfer air to the toilet rooms that is exhausted out of the building, even though it is brought in through the HVAC supply air system from another location.