



# Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,  
"Organization" (§633.026)

## **Informal Interpretation Request**

**Date:** 8/4/22

*National Fire Protection Association (NFPA) Document No. applied by the LFO: **FFPC 18.2.3.2.2**  
Edition of the NFPA Document: **2018 Edition***

*Chapter and Paragraph of the NFPA Document: **FFPC Table 18.4.5.2.1***

*Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above: **Loss of Revenue. Reduction in design efficiency with increase cost.***

*Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered:*

**Fire flow is calculated using the total square footage of a structure per FFPC 1: Table 18.4.5.2.1. This is known as the "Fire Flow Area" (FFPC 1:3.3.14.4), and is different from a "Fire Area" (FFPC 1:3.14.3). It does not consider any fire separations. The minimum fire flow for your project site must be calculated using the fire flow area of the largest structure.**

*Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation:*

**On our site, the largest structure for purposes of fire flow should be 2,500 sf and the required flow and duration from Table 18.4.5.2.1 is 1,500 GPM for 2 hours. As seen on the attached diagram, 3-hour fire resistance walls throughout the facility create a number of smaller structures placed together such that there is no contiguous area exceeding 2,500 sf. This is consistent and similar to the rule that automatic sprinkler systems are not required when 3-hour fire resistance walls are used in a similar manner according to FFPC 13.3.2.27.4.**

*Explain how the Petitioner's substantial interests are being affected by the question below:*

**If we follow the LFO's interpretation, we will needlessly increase the number and location of fire hydrants. This will reduce square footage and revenue and increase construction cost.**

*Enter the Petitioner's question concerning an interpretation of the FFPC:*

**Since 3-hour fire resistance walls result in no contiguous area exceeding 2,500 sf, can the largest structure on site be considered to be 2,500 sf for purposes of Fire Flow Area?**

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Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

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Committee's majority answer: Yes

The fire flow area can be considered to be 2,500 square feet if the 3-hour walls create separate 2,500 square foot buildings in accordance with the Florida Building Code-Building. Among other items, the 3-hour fire walls would need to be constructed as "fire walls" and not "fire barrier walls" and meet the structurally independent provisions of the Florida Building Code. In addition, the exposures created across the fire apparatus access road may require a rating of the roll up doors and face of the separate building across the fire apparatus access road. Consult the Florida Building Code-Building for the full provisions as to how to construct separate buildings on the same lot.

**Region 1** - Delegate: **Byron Bennett**, Fire Chief North Bay Fire Control District  
Alternate: **William (Michael) Hall**, Fire Chief, Marianna Fire Rescue

**Region 2** - Delegate: **Jason R. Greisl** Division Chief of Fire Prevention/Fire Marshal Tallahassee Fire  
Alternate: N/A\*

**Region 3** - Delegate: **James Groff**, Jacksonville Fire Rescue.  
Alternate: **Robert Growick** Division Chief /Fire Marshall City of St. Augustine

**Region 4** - Delegate: **Cheryl Edwards**, Lakeland Fire Rescue  
Alternate: **Karl Thompson**

**Region 5** - Delegate: **Anthony Apfelbeck**, Altamonte Springs Building and Fire Safety Department  
Alternate: **Christina Diaz**, Seminole County Fl.

**Region 6** - Delegate: **Robert Salvaggio**, Cape Corral Fire Rescue  
Alternate: **Janet Washburn**, Bonita Springs Fire Control and Rescue District

**Region 7** - Delegate: **Matthew E. Welhaf**, Boca Raton Fire Rescue Services Department  
Alternate: **(Kenneth) Sean Brown**, Broward Sheriff Fire Rescue & Emergency Services Department.

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## Committee Region Map



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