



Florida Division of State Fire Marshal

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

Informal Interpretation Request

Date: 4/21/22

NFPA Document Number: NFPA 25 2017 Edition.

Paragraph Reference: 5.5

Background:

We are contracted for the replacement of pipe and sprinklers for a four-story parking garage, the local AHJ is requiring us to permit this job as if it is new construction. The local AHJ is being firm on the replacement of system piping, standpipe, and sprinklers that we meet the requirements for a new installation. This causes quite a few problems. It was originally installed to the 1994 edition of NFPA 13. One of the bigger problems was the calculations would not have worked with changing the C-Factor (Galvanized Pipe), however they have agreed to follow 5.5.2 of NFPA 25 to allow the original standard. One of the other issues we are having is the Central ESLO-20 heads are no longer available. The closest extended coverage head we could find as a match for obstructed noncombustible construction was the TY6137. The problem is the TY6137 has a specific application listing for use under concrete tees, where the tees cannot exceed 32 feet in length. I see that non-combustible baffles can be installed; however, this would require quite a bit of time and effort to install to meet the listing. I have tried to argue using 5.5.3 that component replacement shall not require a design review, and also NFPA 13 does not cover system maintenance in its purpose, however they are not going along with it. Also 5.4.1.4 that heads be replaced be of the same characteristics.

Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above:

The building owner would be required to install baffles in the concrete tees of a parking garage based on the LFO interpretation of the standards. In the 1994 edition of NFPA 13 Extended Coverage heads had no limitation on the depth of concrete tees as in the current edition. Currently, sprinklers must have a specific application listing when tees are over a certain depth. This listing requires baffles when the tees are over a certain length.

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

The LFO interprets the Specific Application Listing requiring baffles as being required and does not recognize the use of the Extended Coverage heads without using that listing as per the 1994 edition of NFPA 13.

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:

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

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



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The Specific Application Listing of a sprinkler does not preclude it from use as an Extended Coverage sprinkler in applications not requiring it, such as when installed in conformance with the 1994 edition of NFPA 13. Also, this should not require a design review at all per 5.5.3 of NFPA 25, 2017 edition, and it meets the definition of Section 3.3.39 for replacement. Only Table 5.5.1 requirements should apply.

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

Does NFPA 25, section 5.5, apply to this situation and allow the use of the Extended Coverage sprinkler per NFPA 13, 1994 edition, with no design review required as per NFPA 25 5.5.3 and only meeting NFPA 25 Table 5.5.1 requirements?

Answer: *Yes*

The committee believes that it is the intent of NFPA 25 section 5.5 to allow the original design document (in this case the 1994 Edition of NFPA 13) to be used in regard to components to include adjustments, repairs, or replacement. Furthermore, NFPA 1, 1.4.3 Modifications reads the AHJ is authorized to modify any of the provisions of this Code upon application in writing by the owner, a lease, or a duly authorized representative where there are practical difficulties in the way of carrying out the provisions of the Code, provided that the intent of the Code shall be complied with, public safety secured, and substantial justice done. The petitioner has demonstrated the practical difficulties associated with this project (previous sprinkler heads are no longer available) and that an equivalent head is to be provided.

Note: AHJ should still confirm that the replacement sprinkler heads are equivalent with regards to density, spacing, etc. and that no change of hazard of contents classification has occurred.

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

Region 2 - Delegate: Vacant
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**

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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.

Committee Region Map



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