



Florida Division of State Fire Marshal

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

Informal Interpretation

Date: 11/18/19

NFPA Document Number: 101

Edition: 2015 Florida Specific

Paragraph Reference: 43.6.4.1

Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above: The petitioner is being required to install an automatic sprinkler system within an existing 2-story hotel building undergoing a "renovation" classification of rehabilitation. The hotel is undergoing minor cosmetic alterations to guest units and is installing a monitored fire alarm system as part of this project. The building is constructed of masonry bearing walls, masonry tenant separation walls, and hollow core concrete floor panels w/ 1.5" concrete topping layer at both the 2nd level floor and roof. Additionally, the doors and windows are being replaced with impact-resistant systems as this project is in a wind-borne debris region along the Gulf of Mexico.

Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered: Per email from LFO relating to 101:43.6.4, "One might argue this code is exclusive to the reconstruction classification only, however, because the code in question explicitly references "Rehabilitation Work Areas involving over 50 percent..." and not specifically reconstruction, it therefore applies to all rehabilitation work areas involving over 50 percent (reconstruction, modification and renovation)."

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: We agree that the category of rehabilitation is "renovation". We also contend that the LFO cited 101:43.6.4.1 is not from the "renovation" section but is instead from the "reconstruction" section of the code and not applicable to this project. As such, this project should not require fire sprinklers as the level of rehabilitation is primarily cosmetic in nature and does not meet the threshold of reconstruction as noted in the first paragraph of the LFO's review letter. The LFO should not offer citations from distant sections of the code that are more stringent than the renovation section.

Enter the Petitioner's question concerning an interpretation of the FFPC: Would a 2-story hotel undergoing a "renovation" level of rehabilitation as defined by NFPA101/FFPC (level 1 alteration per FBC, Existing; level 2 alterations for ADA room bathroom upgrades) be required to have an automatic sprinkler system installed as a part of the project?

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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Answer: No

Explanation: Submitted scope of work and plans appear to show two levels of rehabilitation work categories. Work category **(2) Renovation**. The replacement in kind, strengthening, or upgrading of building elements, materials, equipment, or fixtures, that does not result in a reconfiguration of the building spaces within and Work category **(3) Modification**. The reconfiguration of any space; the addition, relocation, or elimination of any door or window; the addition or elimination of load-bearing elements; the reconfiguration or extension of any system; or the installation of any additional equipment.

The Renovation appears to include the entire building to include finishes, cabinets, appliances, plumbing, electrical work, drywall repairs, etc.

The modification category appears to be isolated to two rooms (111&112) included in scope, and are being reconfigured to comply with ADA/Accessibility reasons.

NFPA 101 43.1.3.2 states where a project includes one category of rehabilitation work in one building area and another category of rehabilitation work in a separate area of the building, each project area shall comply with the requirements of the respective category of rehabilitation work.

Although you have a rehabilitation work area category over 50% **(2) Renovation** in this case, the ref. to NFPA 101 43.6.4.1 stated in LFO's comments only applies in regard to the **(4) reconstruction** work category with general requirements beginning in NFPA 101 43.6

Info used for making this determination below as submitted by architect. Be advised interpretation made on basis that all info provided was accurate.

Project Scope of Work:

THE PROJECT CONSISTS OF LEVEL 2 ALTERATION (**RENOVATION PER FFPC**) "UPGRADES" TO AN EXISTING 2-STORY HOTEL WITH 2 UNITS BEING UPGRADED TO ACCESSIBLE ROOMS.

PROJECT SCOPE "COURTYARD GUEST ROOMS BUILDING":

1. REPLACEMENT OF INTERIOR FINISHES.
2. REPLACEMENT OF THE KITCHEN APPLIANCES AND CABINETRY.
3. RETILING OF SHOWERS.
4. REPLACEMENT OF EXISTING PLUMBING FIXTURES IN PLACE.
5. REPLACEMENT OF EXISTING LIGHTING FIXTURES.
6. REPLACEMENT OF EXISTING POWER RECEPTACLES & SWITCHES IN PLACE.
7. REPLACEMENT OF UNIT ENTRY DOORS & SIDELITES TO IMPACT RESISTANT.
8. REPLACEMENT OF BALCONY/PORCH SLIDING GLASS DOORS TO IMPACT RESISTANT.
9. REPLACEMENT OF WINDOWS TO IMPACT RESISTANT.
10. RECONFIGURATION OF 2 UNITS FOR ADA/ACCESSIBILITY PURPOSES.

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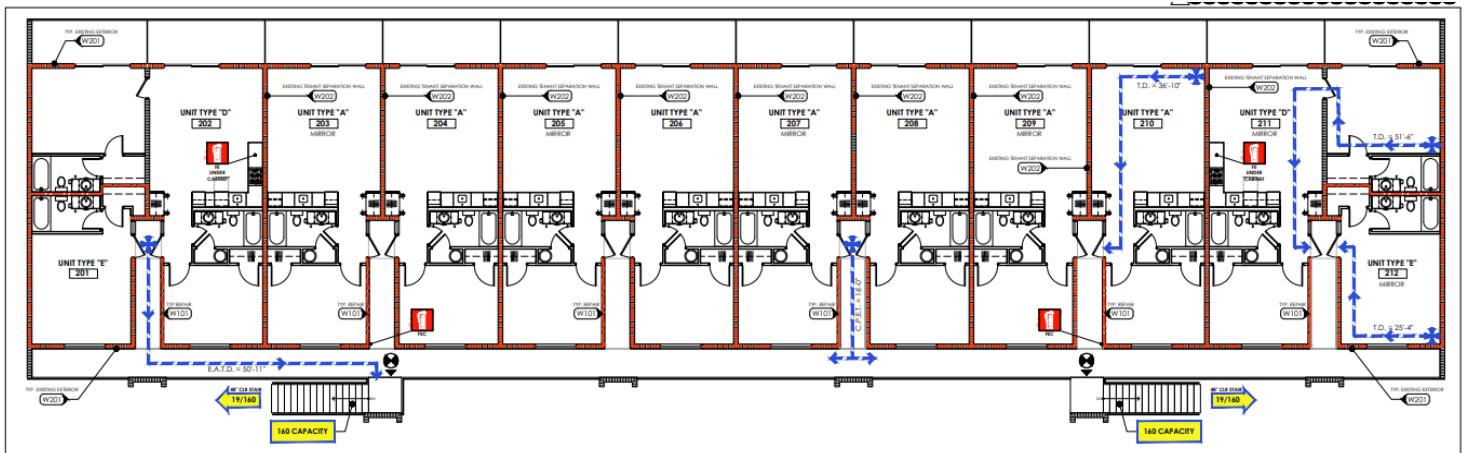
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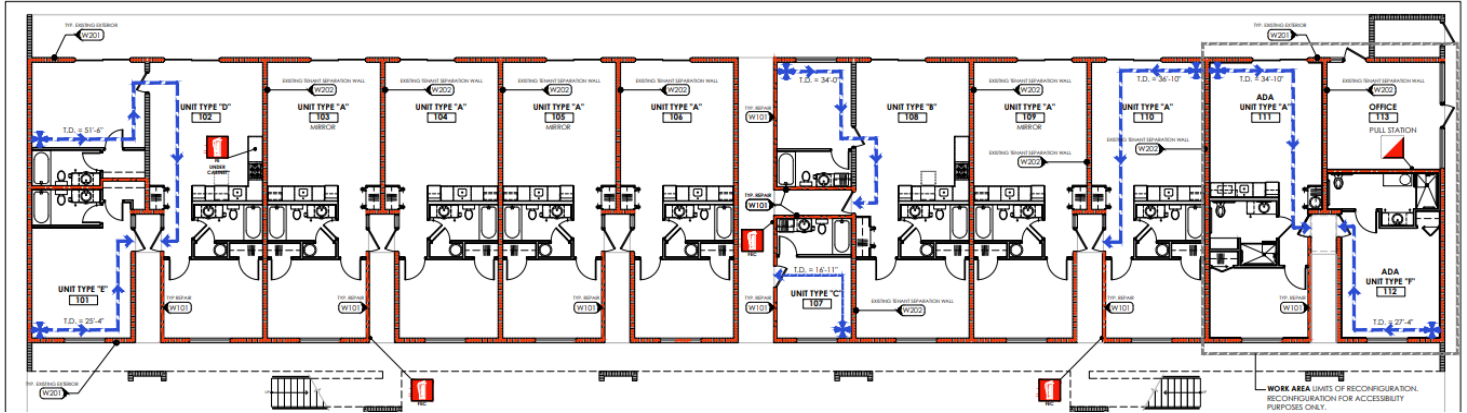
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- 11. COMMUNICATION UPGRADES TO 2 UNITS FOR HEARING IMPAIRED GUESTS.
- 12 ADDITION OF A NEW NFPA 72 COMPLIANT MONITORED FIRE ALARM SYSTEM. (VENDOR DESIGNED)



2 LIFE SAFETY PLAN - LEVEL 2 (COURTYARD BUILDING)
SCALE: 1/8" = 1'-0"

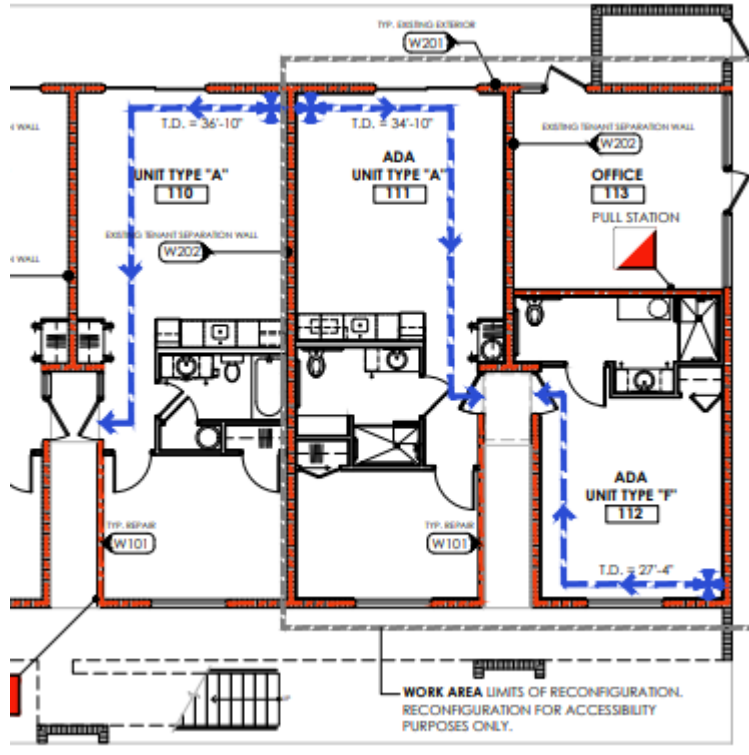


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Committee Answer Submitted by,
James Groff, Chairman
Informal Fire Code Interpretation Committee

- Region 1: Vacant / Vacant
- Region 2: Babette Ferris-No response / Vacant
- Region 3: James Groff-No / Robert Growick-No
- Region 4: Philip Guglietti-No / Cheryl Edwards-No
- Region 5: Anthony Apfelbeck -No / Timothy Ippolito No
- Region 6: Robert Salvaggio-No /Alternate Janet Washburn-No
- Region 7: Bryan Parks-No Response / Vacant

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Committee Region Map



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