



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
In accordance with FAC 69A-60.011

Informal Interpretation

Date: 5/14/19

NFPA Document Number: NFPA 101, 2015

Paragraph Reference: Chapter 7 Section 7.2.6

For purpose of this petition, pertinent factors do not include the name of the governmental agency or persons representing that agency. Petitioners are discouraged from making any personal assertions about an agency or agency official. If this involves an actual situation, briefly explain all of the pertinent factors.

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

The additional corridor required for approval by the City of Tampa consumes leasable square footage as noted in the attachment. Additionally, the rejection is based on a code section that the petitioner believes does not prevent the issue that was cited by City of Tampa. The code section defers to the operational responsibility of the owner in order to ensure that a code violation is not present. Lastly, the matter represents a significant cost impact.

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

The matter in question was discussed with Mr. Traina after an initial permit review comment was provided by Inspector Welch. Mr. Traina agreed with his inspector who indicated that a service corridor cannot be an exit passageway per NFPA 101 Ch. 7.2.6. The inspector had also noted that the layout of the building and exit passageway showed that the passageway is used for a work area and is not approved as an exit. In Mr. Traina's e-mail supporting his inspector's position (a copy of which is attached), Mr. Traina indicated that an exit passageway is an extension of the stairwell. Mr. Traina also indicated that the fundamental question is: Could an exit passageway described in Florida Fire Prevention Code NFPA 101 Section 7.2.6 be utilized as a service corridor for adjoining occupancies?

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:

The petitioner respectfully believes that FFPC 101 Section 7.2.6 does not prohibit exit passageways from being used to transfer materials in and out of the building. FFPC 101 Section 7.2.6 references Section 7.1.3.2.3, which states that exits shall not be used for any purpose which could interfere with its use as an exit. Similarly, FFPC 101 Section 7.1.10.1 requires that the means of egress be continuously maintained free of all obstructions or impediments to use in an emergency. The use of the exit passageway for transferring material in and out of the building does not interfere with the exit passageway's use as an exit, so long as material and equipment are not left or stored within the exit passageway. The exit passageway/service corridor will be used as a pathway for transferring material to the tenant spaces and freight elevator from the loading area. The use of a passageway for transferring materials is inherently permissible as noted in the exhibits provided in Figures 7.131 and 7.132 of the NFPA 101 Handbook provided below:

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

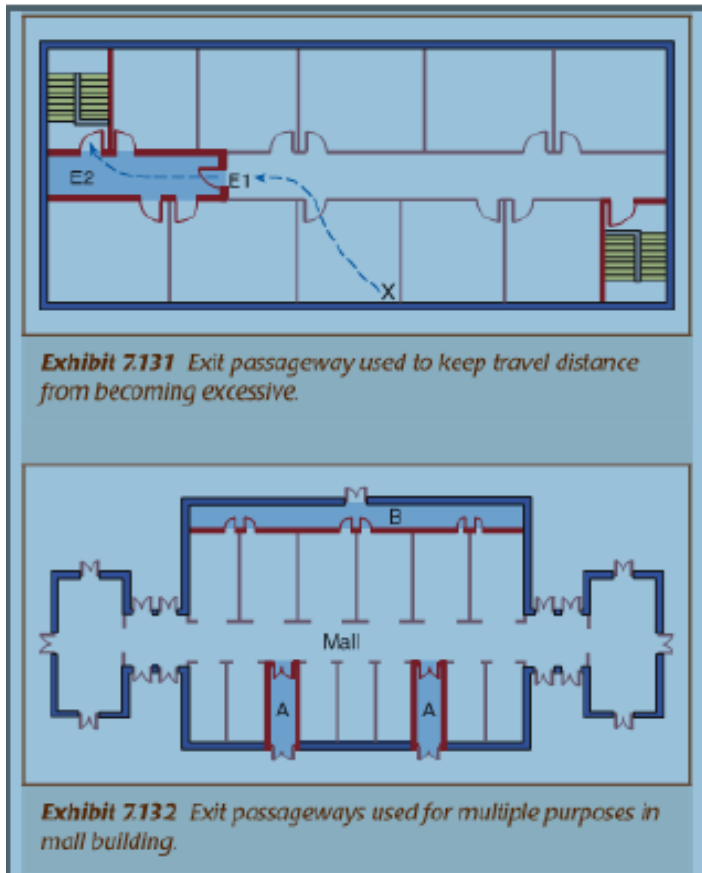
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The exit passageways in the figures above would require that materials be transferred through the passageway in order to properly serve the functional use of the respective tenant areas. It is also worth highlighting that the Appendix material to NFPA 101 Section 7.2.6.1 states that “examples of building elements that might be arranged as exit passageways include hallways, corridors, passages, tunnels, underfloor passageways or overhead passageways.” By referencing the various functions noted in the aforementioned text, the code does not restrict the use of the exit passageway to simply being utilized for means of egress purposes.

The owner has proposed to use operational controls to ensure that the requirements of FFPC 101 are met and materials are not stored within the exit passageway. Signage is proposed to be provided within the exit passageway that prohibits the storage of any item within the exit passageway. In addition, signage is proposed for all 90-minute rated exit passageway doors that states “Fire Door Keep Closed”, to ensure that fire doors are not left propped open.

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Explain how the Petitioner's substantial interests are being affected by the question below: The additional corridor required for approval by the City of Tampa consumes leasable square footage as noted in the attachment. Additionally, the rejection is based on a code section that the

petitioner believes does not prevent the issue that was cited by City of Tampa. The code section defers to the operational responsibility of the owner in order to ensure that a code violation is not present. Lastly, the matter represents a significant cost impact.

Enter the Petitioner's question concerning an interpretation of the FFPC: Could an exit passageway described in Florida Fire Prevention Code NFPA 101 Section 7.2.6 be utilized as a service corridor for adjoining occupancies?

Committee Response

Answer: Yes

An exit passageway serves as a horizontal means of exit travel that is protected from fire the same as enclosed stairwells. Exit passageways are often used to avoid excessive travel distances, or to comply with code requirements for exiting at least 50% of the building occupant load directly to the outside. They like all other components of egress are required to be continuously maintained free of all obstructions or impediments for full instant use in fire and other emergencies (see NFPA 1 14.4). It is however understood (see commentary NFPA 1 Fire Code Handbook 2015) that obstructions may occur on a short duration basis, and goes on to say that in these instances that awareness training should be provided to insure blockages are kept to a minimum and procedures are established and in place for the control and monitoring of the area affected.

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

Region 1: Vacant

Region 2: Babette Ferris (NR)

Region 3: James Groff (Yes) Robert Growick (Yes)

Region 4: Philip Gugliettie (No) Cheryl Edwards (NR)

Region 5: Anthony Apfelbeck (Yes) Tim Ippolito (Yes)

Region 6: Robert Salvaggio (Yes) Kathy Szostak (yes)

Region 7: Bryan Park (Yes) Janet Washburn (NR)

- NR indicates no response.

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Region 1 - Delegate: Vacant
Alternate: N/A*

Region 2 - Delegate: Babette Ferris, Tallahassee Fire Department
Alternate: N/A*

Region 3 - Delegate: James Groff, Jacksonville F. R. (Committee Chair)
Alternate: Robert Growick

Region 4 - Delegate: Philip Gugliettie, St. Petersburg F.R.
Alternate: Cheryl Edwards

Region 5 - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department
Alternate: Tim Ippolito, Casselberry F. R.

Region 6 - Delegate: Robert Salvaggio
Alternate: Kathy Szostak, City of Naples

Region 7 - Delegate: C. Bryan Park, Broward County Board of Rules & Appeals
Alternate: Janet Washburn, City of Hollywood Fire Rescue

Committee Region Map



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