



Florida Fire Marshals And Inspectors Association

Informal Interpretation

Date: March 19, 2010

NFPA Document Number: NFPA 1 Chapter 13

Edition: 2007

Paragraph Reference: 13.1.6 & 13.3.2.25.1

If this involves an actual situation, explain briefly:

FFPC (2007 Edition) Section at Issue: 13.3.2.25 New Storage Occupancies 13.3.2.25.1 High-Piled Storage. An automatic sprinkler system shall be installed throughout all occupancies containing areas greater than 2500 feet² (232 m³) for the high-piled storage of combustibles.

The building at issue is in the unincorporated area of Escambia County.

The building was constructed prior to the effective date (December 31, 2008) of the 2007 Edition of the Florida Fire Prevention Code.

At the time of its construction, the intended occupancy of the building was for high-piled storage.

The actual use of the building both prior to and on December 31, 2008 was for high-piled storage. Section 1.3.6.2 of the FFPC provides that buildings in existence or permitted for construction prior to the adoption of this Code shall comply with the provisions stated herein or referenced for existing buildings.

Section 10.3.2 of the FFPC provides that existing buildings that are occupied at the time of the adoption of this Code shall remain in use provided the following conditions are met: (1) the occupancy classification remains the same; and (2) no condition deemed hazardous to life or property exists that would constitute an imminent danger.

The only occupancy/use of the building is for high-pile storage.

The occupancy classification for the building has not changed since its construction.

No condition deemed hazardous to life or property exists that would constitute an imminent danger.

Section 13.3.2.25 of the FFPC, and its subsections, applies to "New Storage Occupancies."

There is no provision in Chapter 13 (Fire Protection Systems) that applies to high-piled storage for "existing occupancies."



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Question *(should be worded so that it can be answered with either "Yes" or "No"):*

Does Section 13.3.2.25.1 of the 2007 Edition of the Florida Fire Prevention Code require installation of an automatic sprinkler system throughout all areas of a building larger than 2,500 sq. ft. where the only occupancy of the building is for high-piled storage of combustibles, and where the building was both in existence and in use for this occupancy prior to and on the effective date (December 31, 2008) of the 2007 Edition of the Florida Fire Prevention Code?

Answer:

No, based on NFPA 1, Uniform Fire Code, 2006 edition as set forth in the 2007 edition of the Florida Fire Prevention Code.

The requirements of 13.3.2.25 apply to new storage occupancies, therefore, the sprinkler requirement of 13.3.2.25.1 can't be applied to an existing high-piled storage arrangement, assuming such arrangement was compliant at the time of initial occupancy. If sprinklers were required for new high-piled storage occupancy at the time of initial occupancy and they weren't provided, that's an enforcement issue that needs to be resolved by the local authority having jurisdiction.

Committee Answer Submitted by,

Bart Wright, Chair
Informal Fire Code Interpretation Committee