



# Florida Fire Marshals And Inspectors Association

## Informal Interpretation

**Date:** 6/1/11

**NFPA Document Number:** 101-141

**Edition:** 2009

**Paragraph Reference:** 14.3.4

**If this involves an actual situation, explain briefly:** We are in the process of relocating and installing a modular building on our property. The building was originally installed in Bay County. We are installing it in Wakulla County. The building was built in 2001 and certified by DCA in 2001 for educational use. We will use it for educational purposes as well, as it will be used for a private Christian school with children from kindergarten through seventh grade. The building is 6,000 square feet. We are not making any modifications nor adding any additions to the building. Regarding detection, alarm, and communications systems, we currently have a monitored manually initiated fire alarm system with pull stations, audible and visual alarms, and a smoke detector in the sole unoccupied storage space. It is my understanding that this system meets current fire code. The Wakulla County Fire Marshall, Tracey Chance, said our system is not acceptable. She is requiring us to install smoke detectors in every room in the building, 23 smoke detectors total. This will also require us to purchase a new control panel. This will cost us \$9,000 to comply with her requirements. The Fire Marshall has not referenced a specific section of code as her authority for requiring us to install smoke detectors in occupied spaces. Instead, she has referenced several broad areas within the code and said, "I'm the authority and I have the training. You have to do this because this is the way I interpret the code." I think her intentions are good, but it appears that she is erring on the side of caution and doesn't truly understand the code. She referenced 14.3.4.1.1 and said, "fire alarm system means a complete fire alarm system which includes smoke detectors." She further said, "14.3.4.1.1 directs us to 9.6 and 9.6.2.9 requires smoke detectors." When I pointed out to her that 9.6.2.9.1 stated, "where required by another section of the Code" and asked her which other section of the code enacted 9.6.2.9.1 she circled back to 14.3.4.1.1 and stated again, "a complete fire alarm system"

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

In regard to 14.3.4, considering the fact that our building has a single unoccupied storage space that is currently protected by a monitored smoke detector, and the remaining spaces will be occupied by personnel, are we required to install additional smoke detectors in classrooms, restrooms, offices, and corridors?



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**Answer:**

Committee members unanimously rule that the answer to the question is NO and provide the following rationale.

NFPA 101:14.3.4.2.1 requires fire alarm initiation by manual means and does not require smoke detection. Absent a requirement for smoke detection in 101:14.3.4 there is no requirement in 101:9.6 to provide additional smoke detection (101:9.6.2.8). Additionally, 101:9.6.1 defines a “complete fire alarm system” as one which provides functions for initiation, notification and control. Smoke detection is a means of initiation but not specifically required.

Committee Answer Submitted by,

Bart Wright, Chair  
Informal Fire Code Interpretation Committee