**Plumbing Technical Advisory Committee – Errata/Glitch**

**8th Edition (2023) Florida Building Code, Plumbing**

**CHAPTER 7 SANITARY DRAINAGE**

P-FBC-P– Ch. 7– Glitch #2 – (Submitted after the deadline -12/25/2023).

**Staff**

Revise section 718 to add ASTM F1216 to be used as alternative to ASTM F2599, ASTM F25461 and ASTM F3240.

**SECTION 718 REHABILITATION OF BUILDING SEWERS AND BUILDING DRAINS**

**718.1 Cure-in-place.** Sectional cure-in-place rehabilitation of *building sewer* piping and sewer service lateral piping

shall be in accordance with ASTM F2599 or ASTM F1216. Main and lateral cure-in-place rehabilitation of *building sewer* and sewer service lateral pipe and their connections to the main sewer pipe shall be in accordance with ASTM F2561 or ASTM F1216. Hydrophilic rings or gaskets in cure-in-place rehabilitation of *building sewer* piping and sewer service laterals shall be in accordance with ASTM F3240 or ASTM F1216 to ensure water tightness and elimination of ground water penetration.

Reference -

IAPMO’s 2021 Uniform Plumbing Code includes the same three standards: “***715.3 Existing Sewers.*** *Replacement of existing building sewer and building storm sewers using trenchless methodology and materials shall be installed in accordance with ASTM F1216,* ***ASTM F2561****,* ***ASTM F2599*** *or* ***ASTM******F3240***.”

**Criteria for Glitch –**

Equivalency of standards.

* Whether the proposed code change falls within the glitch criteria stated above.

Yes.

* Whether the proposed code change has a Florida specific need.

Yes. The proposed change is necessary to allow for testing alternative to that required by the code.

* What the impact is on small businesses.

No impact.

* Whether the proposed code change has a reasonable and substantial connection with the health, safety, and welfare of the general public.

Yes. The proposed code change allows for more than testing alternative and removes unintended restriction regarding testing of specific product.

* Whether the proposed code change strengthens or improves the Florida Building Code.

Yes. The proposed code change allows for more than testing alternative and removes unintended restriction regarding testing of specific product.

* The proposed code change does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities.

Yes. The proposed code change does not discriminate against materials, product methods, or systems of construction.

* The proposed code change does not degrade the effectiveness of the Florida Building Code.

Yes. The proposed code change allows for more than testing alternative and removes unintended restriction regarding testing of specific product.

TAC Recommendation: Glitch – AM (Comment 3 (Kozan’s) amended to remove extraneous code language)

Commission Action:

**Comment 1 –**

Mo,

As it relates to the proposed changes to Section 718.1, see my response below:

While these suggested changes technically solve the issue, I believe it is not the appropriate fix. This fix does not remove the proprietary language. Still, it creates an unfair advantage for a single company to promote their products and services as being directly in building code, whereas no other vendor can make such claims. The correct fix is to eliminate the known restricted and patented language.

As I’ve stated in the previous meetings, ASTM F1216 is the parent language to all CIPP child languages in ASTM.

My suggested changes to 718.1 would be as follows:

*Trenchless rehabilitation using Cured-In-Place-Pipelining of building sewer and drain lines, including main and lateral piping and their connections to the main sewer pipe, shall be in accordance with ASTM F1216, ASTM F2019, ASTM F1743, or a combination of these standards to allow for complete trenchless rehabilitation. Sectional Cured-In-Place Pipelining of building sewer and drain lines, including main and lateral piping and their connections to the main sewer pipe, shall be in accordance with ASTM F3541, ASTM F1216, or a combination of these standards for Sectional rehabilitation.*

The ASTMs provided are all non-proprietary technical guidelines that essentially apply to all manufacturers and installers in our space and are not controlled by one vendor like the previous ASTM specifications. I have removed the language concerning hydrophilic rings or gaskets in total, as that is strictly a proprietary product and a debated methodology for correcting the elimination of groundwater, especially when other methodologies are available.

Our position remains that the proprietary language should be stricken from the code book. We appreciate your continued conversation and allowing us to be involved in this process.

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| [signature_3632803202](https://sewerfix.com/) | |  | | --- | | **Chris Parker** | | |  | | --- | | **Phone**[800-800-PIPE](tel:800-800-PIPE) ■  **Mobile**[407-726-0383](tel:407-726-0383) | | **Email**[chris@chooseapt.com](mailto:chris@chooseapt.com) | | **Company HQ**[16207 State Road 50, Suite 402 | Clermont, FL 34711](https://maps.google.com/?q=16207%20State%20Road%2050,%20Suite%20402%20|%20Clermont,%20FL%2034711) | | | |  |  |  | | --- | --- | --- | |  |  |  | | |

**Comment 2 –**

January 12, 2024

Florida Building Code

2601 Blair Stone Road

Tallahassee, FL 32399

To Whom It May Concern:

I want to thank you for taking the time to read this message. Please allow me to introduce myself and

the company I represent. My name is Jerry Botts, President of InnerCure Technologies (InnerCureâ).

InnerCureâ is a pipeline rehabilitation technology provider based in Orlando, Florida. InnerCureâ

employs local tax-paying citizens and serves local municipalities within Florida. InnerCureâ prides itself

on developing, testing, and implementing emerging technologies within the buried infrastructure

rehabilitation market, where we are blessed to hold several patents. I served on the Pipeline Advisory

Group committee with the State of Florida and was past president of the National Association of Sewer

Service Companies (NASSCO) from 1999 to 2000. We have recently been made aware of code changes in

the 2023 Florida Building Code, Plumbing, Eighth Edition that took effect on December 31, 2023.

Suppose the proposed changes to Sections 717 and 718 are fully implemented. In that case, it will

significantly and adversely affect Florida’s businesses and the municipalities, utility owners, property

owners, and business owners who utilize competitive technology to adequately correct their sewer

pipeline deficiencies. InnerCureâ and other industry leaders invest in independent third-party testing

that holds manufacturers to pertinent ASTM standards. Improved technological advances reveal various

cost-effective methods to eliminate groundwater inflow and infiltration. 2023 Florida Building Code,

Plumbing, Eighth Edition proposes ASTM F2561, a method of connecting a mainline sewer to a lateral, is

to now be under the plumbing code, rules, and regulations. Certified underground utility & excavation

contractors are to install sewer pipe (or rehabilitate existing pipe) as per local municipal specifications

(or utilizing best technological practices). Once the sewer main line has been installed, the service

laterals are tied in or connected similarly per the governing body's specification. The proposed language

in the 2023 Florida Building Code, Plumbing, Eighth Edition will conflict with the Florida Construction

Industry Licensing Board; a licensed master plumber has no jurisdiction over the mainline sewer.

Furthermore, the proposed language in the 2023 Florida Building Code, Plumbing, Eighth Edition would

now infringe on the responsibilities, territory, and capabilities of a certified utility & excavation

contractor.

Proposed language change:

***SECTION 718 REHABILITATION OF BUILDING SEWERS AND BUILDING DRAINS***

***718.1 Cure-in-place.***

*Sectional cure-in-place rehabilitation of building sewer piping and sewer service lateral piping shall be by*

*ASTM F2599. Central and lateral cure-in-place rehabilitation of building sewer and sewer service lateral*

*pipe and their connections to the main sewer pipe shall be by ASTM F2561. Hydrophilic rings or gaskets*

*in cure-in-place rehabilitation of building sewer piping and sewer service laterals shall be by ASTM*

*F3240 to ensure water tightness and elimination of groundwater penetration.*

InnerCureâ Technologies, Inc.

3424 Shader Rd

Orlando Florida 32808

1.844.748.5200

Specifically for Section 718.1 regarding central and lateral sewer service rehabilitation in the application

of the ASTM F3240, respectively, let it be known there is only one manufacturer of this patented gasket,

which is based in Ottawa, Illinois. Florida has now selected to engage in a single-source technology,

resulting in a specific monopoly effect at the expense of negating trenchless lateral rehabilitation

manufacturers and contractors from competitive bid opportunities in Florida.

I am not sure the state of Florida truly understands the magnitude of pushing the 2023 Florida Building

Code, Plumbing, Eighth Edition, where not only do taxpaying Floridians pay a premium for this singlesourced patented technology but is a certainty that local Florida trenchless manufacturers & contractors are put out of work or pursuing opportunities out of state. 2023 Florida Building Code, Plumbing, Eighth Edition references a single manufacturer's solution without logic and lacking purpose. ASTM F3240, respectively, is a standard that can only be met by purchasing products from one manufacturer and installing them by licensed/authorized installers, which are purposely limited in Florida and other states.

In closing, we do not believe that it is the intent of the State of Florida is trying to limit competition. We

believe the state is “unintentionally unaware” of the solutions available within the trenchless

marketplace. There are more cost-effective methods that have proven viable solutions for addressing

the mainline-to-lateral sewer connection from a holistic approach.

Having been intimately involved in constructing and rehabilitating collection systems in Florida since

1989, I am adamant that competitive bid pricing offers a universal resolution over a single-source

scheme. At the same time, the state of Florida will ultimately achieve its desired outcome while

promoting innovation and healthy competition and putting local Florida businesses to work.

Respectfully,

Jerold L Botts

President

InnerCureâ Technologies, Inc.

Toll Free 1.844.748.5200

Mobile 407.402.2625

[www.innercuretechnologies.com](http://www.innercuretechnologies.com)

[Jerry@innercuretechnologies.com](mailto:Jerry@innercuretechnologies.com)

**Comment 3 –**

**Glitch Amendment – Kozan – Section 718 FBC-Plumbing**

**SECTION 718**

**REHABILITATION OF BUILDING SEWERS AND BUILDING DRAINS**

Revise as follows: (add the following sentence)

**718.1 Cured-in-place**. Cured-in-place rehabilitation of building sewers and building drainage piping shall be in accordance with ASTM F1216 or ASTM F1743. Sectional cured-in-place rehabilitation of *building sewer* piping and sewer service lateral piping shall be in accordance with ASTM F2599. Main and lateral cured-in-place rehabilitation of *building sewer* and sewer service lateral piping and their connections to the main sewer pipe shall be in accordance with ASTM F2561. Hydrophilic rings or gaskets in cured-in-place rehabilitation of *building sewer* piping and sewer service laterals shall be in accordance with ASTM F3240 to ensure water tightness and elimination of ground water penetration.

**Rationale:** The current code language does nothing to address the bulk of cured-in-place (correct terminology) pipe rehabilitations. This proposal adds the applicable standards for both the inversion method (ASTM F1216) and the pulled-in-place method (ASTM F1743). These standards apply to pipe sizes 2 inches and larger. It also clarifies that this section is intended to include building drainage piping as well as building sewers.

The remainder of this section addresses specific types of sewer rehabilitation, including sectional cured-in-place lining (SCIPL), as well as main and lateral cured-in-place lining (MLCIPL), which utilizes seamless molded hydrophilic gaskets (SMHG). Although these installations typically occur beyond the property line and outside the scope of the plumbing code, it is advisable to leave them in place for now in order to track with the I-Codes.

**Comment 3 –**

From: Michael Wilson <mike@pipelt.com>   
Sent: Thursday, January 18, 2024 2:11 PM  
To: Madani, Mo <Mo.Madani@myfloridalicense.com>; Madani, Mo <Mo.Madani@myfloridalicense.com>  
Subject: Comments on 717 and 718

[NOTICE] This message comes from a system outside of DBPR. Please exercise caution when clicking on links and/or providing sensitive information. If you have concerns, please contact your Knowledge Champion or the DBPR Helpdesk.

Good afternoon Mo, these are the comments I put together regarding Section 717 and Section 718. As you can see, I totally see no reason for Section 717 to complicate and confuse the Plumbing Code. As far as Section 718, I understand why Gary feels it can remain. I agree with his suggested revision. The addition of ASTM F1743 to the language will allow latitude that takes away the argument regarding "proprietary advantage”.

I know in the end it will be a consensus decision, but Section 717 is not only confusing, but it will create huge issues with AHJs who see these two Codes as the ONLY understanding for small diameter CIPP installations. We go from NO applicable Codes, to two confusing Codes that have NOTHING to do with small diameter CIPP permitting and inspections in the State of Florida.

The Declaratory Statement DS 2015-106, that you helped authorize, is still the clearest regulation for a constantly changing industry.

Thank you for your continued support for Florida contractors. I hope to see you next Thursday.

Michael Wilson, President/Qualifier

Pipelining Technologies, Inc.

CFC #1428578

(561) 502-0497

[mike@pipeLT.com](mailto:mike@pipeLT.com)



Mo, in regard to **Section 718**, I agree with Gary Kozan’s suggested revision that he shared with me

yesterday.

## SECTION 718

**REHABILITATION OF BUILDING SEWERS AND BUILDING DRAINS**

Revise as follows: (add the following sentence)

* 1. **Cured-in-place**. Cured-in-place rehabilitation of building sewers and building drainage piping shall be in accordance with ASTM F1216 or ASTM F1743. Sectional cured-in-place rehabilitation of *building sewer* piping and sewer service lateral piping shall be in accordance with ASTM F2599. Main and lateral cured-in-place rehabilitation of *building sewer* and sewer service lateral piping and their connections to the main sewer pipe shall be in accordance with ASTM F2561. Hydrophilic rings or gaskets in cured-in-place rehabilitation of *building sewer* piping and sewer service laterals shall be in accordance with ASTM F3240 to ensure water tightness and elimination of ground water penetration.

**Rationale:** The current code language does nothing to address the bulk of cured-in-place (correct terminology) pipe rehabilitations. This proposal adds the applicable standards for both the inversion method (ASTM F1216) and the pulled-in-place method (ASTM F1743). These standards apply to pipe sizes 2 inches and larger. It also clarifies that this section is intended to include building drainage piping as well as building sewers.

The remainder of this section addresses specific types of sewer rehabilitation, including sectional cured-in-place lining (SCIPL), as well as main and lateral cured-in-place lining (MLCIPL), which utilizes seamless molded hydrophilic gaskets (SMHG). Although these installations typically occur beyond the property line and outside the scope of the plumbing code, it is advisable to leave them in place for now in order to track with the I-Codes.

Gary shared the Zoom link for the TAC meeting next Thursday, I am at a trade show in Indianapolis next week but will break away. Take care, I hope to see you next week.

Michael Wilson, President/Qualifier Pipelining Technologies, Inc.

CFC #1428578 (561)

502-0497

[mike@pipeLT.com](mailto:mike@pipeLT.com)