



STATE OF FLORIDA

# DEPARTMENT OF COMMUNITY AFFAIRS

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Secretary

## **MEMORANDUM**

TO: Spessard Boatright, Administrator  
Educational Facilities and Budgeting

FROM: Ila Jones, Administrator  
Codes and Standards

RE: Clarification on August 6, 2007 Memorandum entitled "Cement Bonded Particle-Board (CBPB) Use As A Noncombustible Material in Floor Assembly of Existing Relocatable/Portable Classrooms

DATE: October 12, 2007

The Department has received several comments and questions concerning its August 6, 2007 Memorandum entitled "Cement Bonded Particle-Board (CBPB) Use As A Noncombustible Material in Floor Assembly of Existing Relocatable/Portable Classrooms". The previous memorandum, and subsequent issues identified to the Department, relate to the report by Walker Engineering Inc. of its evaluation of two sets of plans for factory-built school buildings, also referred to as relocatable educational facilities and, within the Walker Report, modular classrooms.

One set of plans depicted a stand-alone classroom not intended to be structurally attached to any other buildings. As identified within the report, this set of plans did not provide detail concerning fire safety elements such as fire detection and fire alarm systems. The second set of plans depicted what was referred to in the August 6 Memorandum as a "clustered building," wherein a number of individual modules have been structurally attached to create a single school building comprised of 12 classrooms. Walker Engineering evaluated the plans in accordance with the methodology of section 1201.6 of the Florida Building Code, Existing Buildings.

The Department believes that the methodology utilized by Walker Engineering is one valid means to determine Code compliance of a factory-built school bearing the insignia of the Department that utilizes cement-bonded particle board. The vast majority of buildings subject to this analysis resemble the first set of plans identified above in all relevant respects and the remedial actions identified by the Walker Report with regard thereto [automatic fire detection and/or fire alarms] are typically, and have been, installed in such buildings on site. Such buildings, by application of the methodology of the Walker Report, comply with the Florida Building Code.

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The building containing 12 classrooms presents more complexities, but buildings constructed in accordance to those or materially similar plans approved by the Department, may be found to comply with the Florida Building Code if the remedial actions identified in the Walker Report have been implemented or via the alternative, site-specific engineering analysis as noted in the report.

Reportedly, some parties have mistakenly applied the Walker Report's analysis of the building containing 12 attached classrooms to the placement of several free-standing buildings in close proximity to one another. This confusion may stem from the different meaning of the term "clustered building" in the requirements of the State Fire Marshal for "clustered buildings" in Rule 69A-58.0082, Florida Administrative Code, and in the second set of plans analyzed by Walker Engineering. The Walker Report does not address placement issues, only those issues identified on plans submitted for department approval. Individual, free standing factory-built school buildings that are independently placed in accordance with Tables 602 and 704.8, and Chapter 10 of the Florida Building Code, Building Volume; and comply with the National Electrical Code may be analyzed consistent with the first set of plans for the stand-alone classrooms identified above. Please note end closures and roof parapet cap flashings to prevent water penetration between the buildings are not considered structural attachments.

In conclusion, the vast majority of the subject buildings comply with the Code by applying the methodology of the Walker Report. In other words, provided the appropriate remedial work identified in the Walker Report is [or has been] performed on-site, the factory-built schools may be used as classrooms. Furthermore, the Department does not anticipate seeking revocation of insignias issued absent further information sufficient to overcome the statutory presumption that buildings that have an insignia attached comply with the Florida Building Code.

If you have any technical questions, you may refer to the report on the internet at [www.dca.state.fl.us/fbc/publications/Report.pdf](http://www.dca.state.fl.us/fbc/publications/Report.pdf), or contact Mo Madani, CBO, at (850) 921-2247.