

Novum Structures LLC | W126 N8585 Westbrook Crossing, Menomonee Falls, WI 53051



<b>FILED</b>	
Department of Business and Professional Regulation	
Deputy Agency Clerk	
CLERK	Brandon Nichols
Date	<b>3/4/2015</b>
File #	

# NOVUM

## PETITION FOR DECLARATORY STATEMENT BEFORE THE FLORIDA BUILDING COMMISSION

**Date:** 03 March 2015

**Company:** Novum Structures LLC  
**Address:** W126 N8585 Westbrook Crossing  
Menomonee Falls, WI 53051

**Name:** Scott Knoblock, PE  
**Title:** Senior Project Engineer  
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# DS 2015-022

**Statue(s), Agency Rule(s), Agency Order(s) and/or Code Section(s) on which the Declaratory Statement is sought:**

Florida Administrative Code  
Rule 61G20-3.001 Scope.

(1) Products in the following categories as defined by subcategories of subsection 61G20-3.002(33), F.A.C., shall be available for approval by the Commission pursuant to Rule 61G20-3.007, F.A.C., for use in the state:

- (a) Panel Walls;
- (b) Exterior Doors;
- (c) Roofing Products;
- (d) Skylights;
- (e) Windows;
- (f) Shutters;
- (g) Structural Components; and
- (h) Impact Protective Systems.

(2) This rule applies to approval of products and systems, which comprise the building envelope and structural frame, for compliance with the structural requirements of the Florida Building Code.

## Background:

I am an engineer with Novum Structures. Novum is an internationally recognized specialty contractor for high technology spatial architectural structures. Our firm designs, manufactures and installs glass clad steel structures. For the sake of this discussion about product approval, we are a manufacturer.

My company received Florida Product approval #FL3885 in January of 2005 for a point supported glass (PSG) panel skylight system for use on canopies and other similar cladding applications that do not enclose a space. We decided to apply for a renewal our product approval (under #17478) for 4 minor reasons provided in the Appendix section of this letter. The product itself has not changed in anyway. We have submitted all the necessary FL PE signed and sealed documents from an independent firm and employed a Validation Entity who has submitted the required checklist.

Norman Bellamy, the government operations consultant who has reviewed our application, has indicated the following:

Dear Product Approval Applicant,

A review of your Florida Product Approval Application has the following comment(s):  
As noted in limits of use "**not for use as part of the building envelope**" and as per Rule 61G20-3 (see below), this product falls outside the scope of the State Product Approval Program. Please see below.

### 61G20-3.001 Scope.

(1) Products in the following categories as defined by subcategories of subsection 61G20-3.002(33), F.A.C., shall be available for approval by the Commission pursuant to Rule 61G20-3.007, F.A.C., for use in the state:

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- (e) Windows;
- (f) Shutters;
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- (h) Impact Protective Systems.

(2) **This rule applies to approval of products and systems, which comprise the building envelope and structural frame,** for compliance with the structural requirements of the Florida Building Code.

## The Question

*Is a skylight product ineligible for a Florida Product Approval solely because it is not part of the building envelope?*

It is our hope that the answer is "no" and that a canopy skylight can receive product approval.

The reason we indicate that our product is not to be used as part of the building envelope is that it is not designed for, nor been tested for, large or small missile impacts. Per Section 1626 of the 2010 FBC the envelope of a building needs to be impact resistant to avoid internal pressure changes to a building due to penetrations in the envelope during a high wind event. Further, in section 1626.1, exception "a" specifically excludes "canopies" from requiring ballistic testing.

We were told back in 2005 that we could forego the missile testing and perform only the uniform load pressure testing and that this would make our product eligible for a product approval for use in non-envelope areas such as canopies. This is what we did and we received product approval and have been installing PSG panels on canopies in Florida since 2005.

We believe the reason we were given that direction and product approval in 2005 was because in the 2010 FBC section 1625.1 and 1625.2 it indicates (paraphrasing) *"any construction where there is insufficient evidence of compliance with the code, the building official may require load testing"* and the load testing needed is defined there. As there is no nationally recognized design standard which provides clear analytical calculation methods, Point Supported Glass is the type of product that would likely fall into this category of requiring testing. As such, we desire the product approval to avoid having to prove ourselves to every building official each time we take on a new project.

We are only asking to renew the approval of a product that has been thoroughly tested and used successfully in the field for many years.

I thank you for your consideration of this matter.

Respectfully



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Scott Knoblock PE  
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## APPENDIX

The four reasons we have applied for a renewed Florida Product approval, which are listed in the introduction to the Evaluation Report of our Product Approval application, are:

- 1) The original approval was given under the 2001 Florida Building Code. Changes below reflect the move to the 2010 Florida Building Code and the use of ultimate wind speeds. The design wind load limits are now presented as a factored value rather than the original un-factored value. As such it is requested that the new Florida Product Approval certification of this product be based on the 2010 Florida Building Code.
- 2) The original approval was for the product manufacturer, MERO Structures, Inc. Mero changed its name to Novum Structures, LLC in 2006. The testing drawings, the test reports and the letter of compliance do not reflect the new name as those documents reflect what was originally tested and therefore there is no need to change the name there. However, we request the name change be present on the Florida Product approval paperwork and on the website.
- 3) The NOA of the PVB interlayer listed on the original approval has expired. However, that same PVB product is listed in a current NOA and therefore deemed appropriate that NOA be listed as part of this product's FL approval.
- 4) The ATI Test Report used in the original approval had an expiration date on the cover. The FL PE who wrote the Evaluation Report has reviewed the current TAS 202-94 and finds no significant changes to the test procedure that would void the results of these tests.