

**Petition for Declaratory Statement**  
**Before The Florida Building Commission**

<b>FILED</b>	
Department of Business and Professional Regulation	
Deputy Agency Clerk	
CLERK	Brandon Nichols
Date	<b>4/20/2016</b>
File #	

**Jurisdiction:** City of Tarpon Springs Florida

**Address:** 324 E. Pine Street

Tarpon Springs FL. 34689

**DS 2016-032**

**Name:** David Gilson

**Title:** Building Development Inspector IV

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

2014 5<sup>th</sup> Edition FBC-Residential and FBC-Fuel Gas

**Background:**

Currently, we have a new single family residence nearing final completion and certificate of occupancy. The contractor for the natural gas portion of the project recently scheduled a final inspection. Upon inspection, the location for the clothes dryer had the steel pipe for the natural gas natural gas termination point with a cap installed. It was noted that termination point did not have the isolation valve installed at the time of inspection. This same residence has the natural gas piping installed in a manner that provides two separate pressures to the building. The regulator at the gas purveyors meter is reduced to 2lbs. and the contractor has provided piping to the opposite side of the house at 2lbs.. The contractor has also provided the side closest to the gas meter with an additional regulator to reduce the pressure to inches. During the final inspection, the gas termination for a future swimming pool heater was also capped with no valve or regulator. This termination point is located on the opposite side of the residence from the gas meter and regulators. This condition was noted and the contractor was asked to identify (label) this termination point to reflect the pressure that is supplied, in this case, 2lbs.. This condition has presented itself on prior occasions with similarity.

The Development Services Department for the City of Tarpon Springs is asking for clarification and guidance as to the proper interpretation of the technical codes and statutes related to this scenario.

Please find my response to the contractor on this topic below.

*FBC-Fuel Gas 5<sup>th</sup> Edition does not cover future installations of gas appliances or how the need for a shut off valve would be handled. The FBC-Residential 5<sup>th</sup> Edition does however cover this topic. In Section G2401.1 second paragraph the definition of coverage reads in part "piping systems shall extend from the point of delivery to the outlet of the appliance shut-off valves" this is also covered in the definitions of FBC-Fuel Gas and FBC-Residential of "Piping System" . Section 404 FBC-Fuel Gas is titled "Piping System Installation" as well as Section G2415 FBC-Residential.*

*Regarding the labeling of the connection point to the future swimming pool heater, in this particular installation, the piping installation has two separate pressures. The regulator from lbs. to inches is installed on the opposite side of the house and serving a system that does not supply the swimming pool heater. The FBC-Fuel Gas 401.5 and FBC-Residential G2412.5 is very clear that steel piping does not require labeling. In this instance, due to our normal permitting procedure with swimming pool contractors, we feel that the installer of the swimming pool heater may expect the stub out for the heater to be on an inches system. Further we feel that the labeling of this connection point would not be considered unreasonably stringent. After the initial construction of the residence is completed and a certificate of occupancy is given, the new owner may choose anyone they wish to construct the swimming pool. They may also utilize their option to act as a contractor themselves. Generally speaking, the outlet for a natural gas appliance in a residential setting is provided at a pressure suitable to the appliance that is intended to be installed. The majority of residential natural gas appliances are intended to be installed on a 7"-14" system; therefore it would be a reasonable expectation to any installer for a suitable pressure to exist at the connection. In addition the majority of residential natural gas appliances have inches-inches regulators to further protect the appliance as the manufacturer has determined to be an adequate pressure range.*

#### **Question #1**

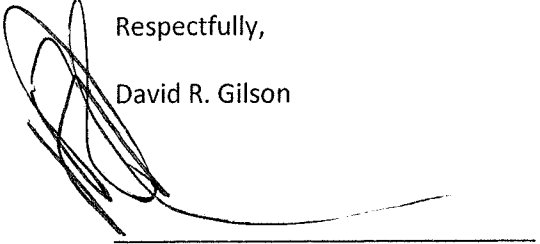
Is an isolation valve required to be installed on a new gas piping system for each intended appliance prior to final inspection and service start up?

#### **Question #2**

Is identification (labeling) required for a future stub out when multiple pressures exist on the same piping system, and the stub out for the future appliance is 2lbs. or more?

We believe the answer to question #1 is yes due to the definition of "Piping System" and the title of FBC-Fuel Gas section 404 and FBC-Residential section G2415.

We believe the answer to question #2 is yes. Although there are no specific code references for the labeling or identification of a steel gas piping system with multiple pressures, we believe it is the intent of the code. Please see FBC-Residential G2412.7 "Piping Meter Identification" as anecdotal data for this scenario. While this scenario does not have multiple meters installed, the fact that more than one pressure is utilized effectively equates to more than one system (meter).

A handwritten signature in black ink, appearing to read 'David R. Gilson', with a long horizontal flourish extending to the right.

Respectfully,

David R. Gilson

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April 20, 2016