



RIDGEWAY
INNOVATIVE PLUMBING SYSTEMS

BUILDING STRONG CO

FILED	
Department of Business and Professional Regulation	
Deputy Agency Clerk	
CLERK	Brandon Nichols
Date	7/3/2014
File #	

July 3, 2014

Florida Building Commission
1940 North Monroe Street
Tallahassee, FL 32399
ATTN: Mo Madani

DS 2014-084

RE: Petition for Declaratory Statement before the Florida Building Commission

Dear Mr. Madani:

I am a plumbing contractor involved in numerous tract residential projects statewide. I have an upcoming single-family project in Indian River County in which the water heaters are located in the garage, but on the same floor level as the interior of the house. I am requesting an interpretation of Section 504.7, Florida Building Code, Plumbing 2010, and its corresponding Section 2801.5 Florida Building Code, Residential 2010.

Both Section 504.7 FBC-P and 2801.5 FBC-R read:

504.7 Required pan. Where water heaters or hot water storage tanks are installed above the ground floor space, in attics or ceiling areas, or within the habitable space, the tank or water heater shall be installed in a galvanized steel or other metal pan of equal corrosion resistance having a minimum thickness of not less than 0.0236 inch (0.6010 mm) (No. 24 gage), or other pans approved for such use.

The issue is whether a water heater that is installed in a garage, but at the same elevation as the interior finished floor, is required to have a pan. It has been my past experience in all of the dozens of AHJs in which we perform work, that the answer is NO. The garage is not considered to be "habitable space", despite whether the garage floor is contiguous with the living space. This interpretation would seem to be backed up by BOAF Informal Interpretation # 4544 (attached).

I am requesting that the Florida Building Code issue a Declaratory Statement, affirming the prior BOAF interpretations, stating that a garage is not habitable space, and that no pan is required even if the water heater is installed at the same elevation as the finished floor of the structure.

It is in the interest of statewide uniformity that I respectfully submit this request.

Sincerely,

RIDGEWAY PLUMBING, INC.

Gary Kozan

COO

Ridgeway Plumbing, Inc. 640 Industrial Ave Boynton Beach, Florida 33426-3694 | Tel. (561) 732-3176 | Fax. (561) 369-0118



Florida Building Code Informal Interpretation



Date: Wed Jul 26 2006

Report #: 4544

Code: Plumbing

Section: 504.7

Question:

Is it the intent of section 504.7 of the fpc not to require a pan for the heater when the heater is installed on the finish floor level of the home in the garage, not the step down section of the garage floor

Answer:

Yes.

Commentary:

A garage is not habitable space and no pan is required even if the heater is installed at the same elevation as the finished floor of the structure.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Community Affairs, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.