

PCA09-DEC-254
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.
Paula P. Ford 7/15/09
Clerk Date

SEA SHUTTERS INC.
Manufacturers of Shutters

Petition for Declaratory Statement

Amendment #2

Petitioner: Sea Shutters Inc.
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I am the President of Sea Shutters Inc. We are located in Marianna, Florida. Our Company is a manufacturer of exterior shutters. We have been in business since 1996 and originally made an open louver bahama product which was tested under the SBCCI SSTD 12-99 protocol in the year 2000. When Florida adopted its own code in 2001 we continued to produce our shutters under local jurisdiction until 2004 when the seal expired. We are now considering several options for future storm products. We have recently completed testing on a new bahama shutter which we are in the process of submitting to the FBC for non HVHZ state-wide approval.

In the preparation for testing our new product under the ASTM protocols I have noticed the distinction the standard has concerning porous and non-porous protective assemblies. It seems the standard (E-1996-05) makes a point of requiring offset requirements to prevent glass breakage for

porous assemblies and non-porous assemblies in wind zone 4 and essential facilities in all wind zones, but non-porous assemblies do not have offset requirements in wind zones 1, 2 and 3.

Therefore, please address the question concerning the requirement of adequate separation of storm shutters, including impact protective systems that are porous and non-porous, from the underlying glazing to prevent glass breakage.

The above question was addressed by means of a Declaratory Statement which arose from a petition filed in case #: DCA08-DEC-002. The FLORIDA BUILDING COMMISSION, hereinafter referred to as FBC, ruled by said Declaratory Statement as follows in part:

4. The Code requires that shutters prevent internal pressurization of a building. Separation of storm shutters from protective glazing should be calculated to avoid internal pressurization.

5. On the basis of the foregoing, shutters may be designed in such a manner that permits glass breakage whether or not the shutter seals the opening created, so long as the opening is not sufficient to permit pressurization of the building.

These conclusions were arrived at by the FBC thru sections of the ASTM E-1996-05 Section 7-Pass/Fail Criteria standard which is adopted as an acceptable protocol for wind-borne debris regions by the Florida Code. ASTM E-1996 has several references to 2 distinct impact protective system classifications, porous and non-porous.

A porous impact protective system is defined under Section 3. Terminology, in particular Section 3.2.11, as follows: an assembly whose aggregate open area exceeds ten percent of its projected surface area. It follows then that a non-porous assembly has ten percent or less aggregate open area of its projected surface area.

This petition is requesting a clarification of the requirement in Clause 5. of the Declaratory Statement referenced above which we believe is provided in Section 8 of the same standard ASTM E 1996-05.

Section 8.3 thru 8.3.2 of the referenced standard states as follows, Porous impact protective systems and all impact protective systems in Wind Zone 4 and in essential facilities in all Wind Zones that are tested independently of the fenestration assembly shall be accepted for installations in which they are offset from the fenestration assemblies by the greater of the following:

8.3.1 The maximum dynamic deflection, as measured in 5.5 plus 25% or,

8.3.2 The sum of the maximum deflection and the residual deflection, as measured in 5.5 plus 25%.

In conclusion, we believe the ASTM E -1996 standards clearly distinguish between a non-porous and porous impact protective system when it comes to offset and glass breakage. All porous systems have offset requirements which are determined by the deflection results and criteria referenced above. Non-porous systems do not have offset requirements except as follows: Wind Zone 4 and essential facilities in all Wind Zones.

We, therefore, respectfully request the FBC issue a Declaratory Statement to answer the following questions.

1. Can a non-porous impact protective system in Wind Zone 1, 2 or 3 which is not on an essential facility and was tested independently of the fenestration assembly be installed in a manner which would allow glazing contact resulting in breakage.

2. Can a non-porous impact protective system in Wind Zone 1, 2 or 3 which is not on an essential facility and was tested independently of the fenestration assembly be installed over an opening or widow regardless of its design pressure rating.

3. Can a porous impact protective system in any Wind Zone and was tested independently of the fenestration assembly be installed in a manner which would allow glazing contact resulting in breakage.

4. Can a porous impact protective system in any Wind Zone and was tested independently of the fenestration assembly be installed over an opening or widow regardless of its design pressure rating.

Sincerely,

Mike Harris
Sea Shutters Inc
850 526-1940