

Tracking Chart – Special Occupancy TAC

Mod #	Proponent	Chapter	Section	Summary	No Affirmative Recommendation
8038	Joseph Garrity	4	453.27.3	Now, innovative relocatables falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But, incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II or IV relocatable.	Commission Action <input type="checkbox"/> AS <input type="checkbox"/> AM <input type="checkbox"/> I <input type="checkbox"/> W <input type="checkbox"/> NAR
Comment					
<input type="checkbox"/> 1. Support comment. Comment sufficiently addresses the TAC's concern(s).		<input checked="" type="checkbox"/> 2. Do Not Support comment. Comment does not address the TAC's concern(s).		A1 0 Yes – 6 No	
<input type="checkbox"/> 3. No comment is needed.		<input type="checkbox"/> 4. Straw Poll.			

Date Submitted 12/12/2018	Section 453.27.3	Proponent Joseph Garrity
Chapter 4	Affects HVHZ No	Attachments No
TAC Recommendation No Affirmative Recommendation		
Commission Action Pending Review		

Comments

General Comments No	Alternate Language Yes
----------------------------	-------------------------------

Related Modifications

Summary of Modification

Now, innovative relocatables falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But, incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II or IV relocatable.

Rationale

Currently, combustible Type V construction is not allowed for relocatables for use in public educational facilities. However, there have been great advances in the design to Type V construction for relocatables including cost-effective, advanced designed Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System.

These innovative relocatables falling under Type V are not permitted via the pre-manufactured building program as SREF-compliant for classroom use. But, incorporating fire sprinklers in a Type V relocatable provides greater life-safety than that of a non-sprinklered Type I, II or IV relocatable. Automatic suppressions systems limit fire impact in educational properties.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

None - Plan Review and Construction Inspections would be the responsibility of the manufacturer, as under the Florida modular building program. Local costs would be the same for inspection of installation and site plan review, as with currently allowed units under the current code language.

Impact to building and property owners relative to cost of compliance with code

Minimal - the costs for NFPA 25 required inspections per pre-manufactured unit could be as little as \$300/year depending on the volume of units inspected at a time.

Impact to industry relative to the cost of compliance with code

None, in part due to the fact that the proposed change would not impact currently permitted relocatables. There will be no increased cost for Type I, II or IV relocatables, and the cost for Type V will be factored into the overall design and construction cost bore by the manufacturer.

Impact to small business relative to the cost of compliance with code

None, there is no change in the cost of compliance relative to the current code. Moreover, the change requested is specific to public educational facilities and not small businesses.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public

The purposed amendment allows Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building Code, Section 453.27.3.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction

Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently allowed under the Florida Building Code, Section 453.27.3. The amendment allows for better products, methods, and systems of construction.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities

The proposed change expands the types of materials, products, methods, and systems of construction allowed under the Florida Building Code, Section 453.27.3 while ensuring safety by requiring Type V construction to be fully sprinklered when used as a relocatable in public educational facilities.

Does not degrade the effectiveness of the code

The current code allows structures that are not fully spinklered. Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building Code, Section 453.27.3.

2nd Comment Period

8038-A1

Proponent	Joseph Garrity	Submitted	5/26/2019	Attachments	Yes
------------------	----------------	------------------	-----------	--------------------	-----

Rationale

Currently, combustible Type V construction is not allowed for relocatables for use in public facilities. However, there have been great advances in the designs of type V construction from relocatables including cost-effective, advanced designed Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkles System. These advances include structures with materials not susceptible to decay or termite damage. These advances include having materials and construction methods in compliance with all parts of the Florida Building Code regarding protection from decay and termites.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

None - Plan Review and Construction Inspections would be the responsibility of the manufacturer, as under the Florida modular building program. Local costs would be the same for inspection of installation and site plan review, as with currently allowed units under the current code language.

Impact to building and property owners relative to cost of compliance with code

Minimal - the costs for NFPA 25 required inspections per pre-manufactured unit could be as little as \$300/year depending on the volume of units inspected at a time.

Impact to industry relative to the cost of compliance with code

None, In part due to the fact that the proposed change would not Impact currently permitted relocatables. There will be no increased cost for Type I, II or IV relocatables, and the cost for Type V will be factored into the overall design and construction cost bore by the manufacturer.

Impact to Small Business relative to the cost of compliance with code

None, there is no change in the cost of compliance relative to the current code. Moreover, the change requested is specific to public educational facilities and not small businesses.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public

The proposed amendment allows Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater; safety than what is currently required under the Florida Building Code, Section 453.27.3.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction

Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater; safety than what is currently allowed under the Florida Building Code, Section 453.27.3. The amendment allows for better products, methods, and systems of construction.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities

The proposed change expands the types of materials, products, methods, and systems of construction allow under the Florida Building Code, Section 453.27.3 while ensuring safety by requiring Type V construction to be fully sprinklered when used as a relocatable in public educational facilities.

Does not degrade the effectiveness of the code

The current code allows structures that are not fully spinklered. Having Type V relocatables that are fully protected by a NFPA 13 Fire Sprinkler System provides equal, or greater, safety than what is currently required under the Florida Building Code, Section 453.27.3.

Is the proposed code modification part of a prior code version? No

1st Comment Period History

SP8038-G1

Proponent	Don Whitehead	Submitted	2/4/2019	Attachments	Yes
------------------	---------------	------------------	----------	--------------------	-----

Comment:

See attached file.

453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System and is (a) constructed of material not susceptible to decay and termite damage or (b) is fully compliant with all sections of Florida Building Code regarding protection against decay and termites related to material and construction methods used.

453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System.

453.27.3 Construction type. All new relocatables constructed, purchased or otherwise acquired by a board shall be noncombustible Type I, II, or IV construction, or Type V Construction if fully protected by a NFPA 13 Fire Sprinkler System and is (a) constructed of material not susceptible to decay and termite damage or (b) is fully compliant with all sections of Florida Building Code regarding protection against decay and termites related to material and construction methods used.

As staff to the State Board of Education, I would not be able to recommend acceptance of Modification SP8038. This code modification seeks to allow Type V construction, which would allow light weight wood construction in public educational facilities. Currently, the State Board of Education has not authorized light weight wood construction. This change proposes to eliminate a Florida-specific requirement that was adopted to promote the public health and safety of the schools in Florida. The ICC model codes do not take into account the unique situations in Florida as shown by the following explanations:

Relocatables constructed in Florida are vulnerable to termite damage and other wood destroying organisms, such as powderpost beetles and carpenter bees. Because the destruction is hidden below the surface, pest control inspections can only minimize the danger, but not completely eliminate it. Because noncombustible construction is extremely durable, fire and termite resistant, and has a life expectancy of around 100 years, it is a popular building material in Florida. Because wood deteriorates more quickly with the high humidity in Florida, its life expectancy is about 25 years. Also, fire-retardant treated wood is expressly prohibited from being used in the construction of educational facilities by Rule 6A2.0010, of the Florida Administrative Code.

As an example of the potential hazard, allow me to share one school district's experience. Marion County School District was conducting an asbestos abatement of Anthony Elementary Cafetorium. During the asbestos abatement of the 9x9 floor tiles, one of the workers fell through the floor exposing the serious structural damage of the original wood floor framing system, which had been destroyed by powderpost beetles. Wood destroying organisms can cause structural failure without warning, and endanger the life safety of the occupants.

As staff to the State Board of Education, I urge the committee to not approve this code modification as submitted.