

Declaratory Statement Report
August 12, 2025
Florida Building Commission
TELECONFERENCE/WEBINAR

Plumbing TAC

DS 2025-019 - Larry Burchett

Question 1. Since the builder and plumber allowed the substitution of a thermal expansion tank required by the manufacturer to be substituted, using a relief valve, is this Code applicable in this situation?

Question 2. Since the builder and plumber allowed the use of a pressure relief valve rated at 125 psi to be used as a substitution of a thermal expansion tank, is this Code section applicable in this situation?

Question 3. Does the wording "a means for controlling increased pressure" [in Code Section P2903.4] allow for any means? As an example, could you use a hot water bottle plumbed into the system? Could you use a pressure cooker blow off valve to control pressure? Could you use a non-rated ASME Device to control increased pressure?

Question 4. Can a Shutoff Valve be installed between any relief valve and the hot water heating device? [O]r worded differently, Can a relief valve be installed in front (upstream) of a shutoff valve and the hot water heater to control pressure created by the thermal expansion?

Answer: *The Plumbing TAC recommends denying the petition since it asks the Commission to opine on the past actions of other individuals, seeks approval or disapproval of past conduct, and is suggesting changes to the Florida Building Code which must occur via the rulemaking process.*

DS 2025-021 - Martin Aquatics

Question #1: Does the exemption stated in Sections 454.1.11.2 and 454.1.12.2 apply not only to Section 454.1.6.1.1, but also to Section 403.6 of the Florida Building Code, Plumbing, which otherwise replicates the same fixture count requirements?

Answer: The answer to the Petitioner's question is yes. The requirements of section 403.6.1 of the Florida Building Code, Plumbing, 8th Edition (2023), are the same as those of section 454.1.6.1.1 of the Florida Building Code, Building, 8th Edition (2023). Therefore, the requirements of section 403.6.1 of the Florida Building Code, Plumbing, 8th Edition (2023) are not applicable to an artificial lagoon facility as defined in

sections 454.1.11.1 and 454.1.12.1 ([Surf pools](#)) of the Florida Building Code, Building, 8th Edition (2023).

Question #2: Should the more specific language in Sections 454.1.11.2 and 454.1.12.2 be interpreted to supersede the general fixture count requirement in Section 403. 6 for sanitary facilities serving patrons of an artificial lagoon?

Answer: See answer to question 1.

Question #3: Would the Commission confirm that the correct interpretation is that both Section 454.1.6.1.1 and Section 403.6 do not apply to artificial lagoons with regard to fixture counts?

Answer: See answer to question 1.