

August 11, 2022

Mo Madani
Florida Building Commission
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Re: Senate Bill 4-D

Mo,

I have read all the comments today. My concern again is the visual aspects of Senate Bill 4-D and the reliance from engineer to engineer or architect to architect, in a uniform manner to address issues that are seen with the naked eye.

I totally agree with Carmelo Giglio. PE, SI, in that “surface imperfections such as cracks, distortion, sagging, deflections, misalignments, signs of leakage, or peeling of finishes” are industry standards for the surface of distressed concrete. However, these indicators usually have to be scientifically tested by non-destructive or destruction methods to determine causation, especially in a court of law.

NDT Protocols for existing buildings are as follows for **Phase 2**:

1. ASTM F1869 – Chloride test for concrete
2. ASTM C876 (half-cell) – Scan of concrete at a depth of 6” to measure rebar deterioration
3. ASTM C1153- Thermography
4. ASTM D8231 modified – Electronic Leak Detection of membrane roofing
5. AAMA 511 – Pressure Testing of Fenestrations
6. ASTM D4580 – Delam roller for Stucco and Concrete

When buildings are under construction, Architects rely on ASTM and AAMA standards, and have for decades. Condos are no different. I have seen “As Built” drawings of Condos back forty years old and they all field tested their windows and sliding glass doors using AAMA protocols.

I once was asked by a Structural Engineer to meet him at a 38-storied condo on Miami Beach to look at a potential Irma claim related to windows. While conducting a tour of the facility with a Board President he commented that the small plastic shrinkage crack in the pier cap was a possible structural issue caused by Irma. This crack was approximately ¼ inch thick if that.

Without knowing the depth, or if the tiny crack was dynamic or not he had visually looked at and then pronounced doom and gloom to the Board President. This crack could have been formed during curing, only God would have known. He then went outside and pronounced that the hundreds of cracks in the exterior stucco were also a result of Irma.

I later asked the maintenance man when the last time was his building either painted or coated. He replied, twelve years ago. I then asked him did he know the difference between a paint and a coating and he said he did not. I told him that is ok, I have asked hundreds of professionals that question without an answer.

Scientific testing protocols used to build new condos are also used by architects and engineers during building restoration projects. Dolphin Towers in Sarasota, Florida did not fix their condemned structurally un-sound condo building by the use of eyesight alone. ASTM and AAMA protocols were used, and no one died.

Senate Bill 4-D and the subsequent recommendations of the Existing Building Inspection Work-Group should also use scientific testing protocols at **Phase 2** not just mere eyesight to determine the Structural Integrity of a Building.

Respectfully submitted as a citizen of Florida for approval.

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