



# Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,  
"Organization" (§633.026)

## **Informal Interpretation**

**Date:** 9/28/19

**NFPA Document Number:** NFPA 1    **Edition:** 2015 Florida Specific

**Paragraph Reference:** NFPA 1 13.3.2.27.4

*Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above: Have a self storage project in plan review for building permit. Buildings in question are single story drive up self storage subdivided into 2500 sf buildings with 3 hour firewalls, individual units defined by non-rated metal partitions. Section above would also require demising walls be one (1) hour fire barriers to avoid fire sprinklers.*

*Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered: LFO indicates 2500 SF max building and one hour separation around individual units. Interpretation offered as plan review comment.*

*Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation: Citation should require max 2500 SF bldg where individual units are not one hour fire separated, as is stated in 5th Edition. 6th Edition does not flag change from 5th edition as a revision and in my opinion 6th edition says same thing, but not as clearly.*

*Explain how the Petitioner's substantial interests are being affected by the question below:*

*Enter the Petitioner's question concerning an interpretation of the FFPC:*

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Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: [www.FFMIA.org](http://www.FFMIA.org) | Email: [info@ffmia.org](mailto:info@ffmia.org) | [http://www.myfloridacfo.com/sfm/bfpr/bfpr\\_index.htm](http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm)



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**Answer:** No (Question Inferred by the Committee)

There is not really a question being asked here but the majority of the committee believes as follows:

Is an automatic fire sprinkler system required in a mini-storage building that is less than 2,500 square feet with individual units that are not separated by at least a 1-hour fire resistance-rated barrier?

No. The language in 13.3.2.27.4 established two criteria: 1. Building greater than 2,500 square feet and 2. Units separated by less than a 1-hour fire-resistance rated barrier. The inclusion of "and" in the code text means that both criteria would have to be met in order to require fire sprinklers

Examples:

- A. Building is 5,000 square feet and 1 hr rated fire partitions: No fire sprinklers required
- B. Building is 2,000 square feet and has no fire rated partitions separating the units: No fire sprinklers required.
- C. Building is 5,000 square feet and no fire rated partitions separating the units: Fire sprinklers required.

Committee Answer Submitted by,  
Jon Pasqualone, FFMIA Executive Director  
Acting on behalf of Chair of the  
Informal Fire Code Interpretation Committee

Region 1: Vacant / Vacant  
Region 2: Babette Ferris-No response / Vacant  
Region 3: James Groff-N/A Recused Robert Growick-No response  
Region 4: Philip Guglietti-No / Cheryl Edwards-Yes  
Region 5: Anthony Apfelbeck -No/ Timothy Ippolito- No response  
Region 6: Robert Salvaggio-No /Alternate Kathy Szostak- No  
Region 7: Bryan Parks-No Response

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