



January 5, 2007

Mo Madani, Planning Manager  
Florida Department of Community Affairs  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100

DCA07-DEC-002  
FILING AND ACKNOWLEDGEMENT  
FILED, on this date, with the designated  
Clerk, receipt of which is hereby  
acknowledged.  
Paula P. Ford 1/9/07  
Commission Clerk Date

**RE: Petition for Declaratory Statement to the Florida Building Commission  
Florida Building Code, Chapter 4, Table 424.2.4**

Dear Mr. Madani,

Please consider this letter a request for a Declaratory Statement. I am requesting a clarification of the *Florida Building Code - Building* relating to the storage of corrosive liquids, in particular liquid chlorine, at a site where the principle building use is mercantile. Specifically, this petition refers to the placement of a liquid chlorine storage tank located at a swimming pool supply company in southwest Florida.

**Question:** Is the 975 gallon maximum allowable quantity limit for corrosive liquids shown in Table 424.2.4 modified by the provisions contained in Note "f" to said table, thus allowing maximum capacity of 1,950 gallons of liquid if the provisions of the Florida Fire Prevention Code for an outside control area have been satisfied?

(Please note that Table 414.2.4 provides limits for both indoor and outdoor storage of hazardous liquids at mercantile facilities to 975 gallons with a maximum increase of 100% in Note f. of the table.  
*Note f. to Table 414.2—f. Maximum quantities shall be increased 100 percent in outdoor control areas.*)

This request has implication statewide as various building departments are treating the requirements for liquid chlorine storage tanks differently depending on their interpretation.

Thank you in advance for your consideration of this request.

Sincerely yours,

  
Kari Hebrank

## Background

Liquid chlorine is a corrosive as defined in the code.

### **SECTION 307 - HIGH-HAZARD GROUP H**

#### **307.2 Definitions:**

**CORROSIVE.** A chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the point of contact. A chemical shall be considered corrosive if, when tested on the intact skin of albino rabbits by the method described in DOT 49 CFR, Part 173.137, such a chemical destroys or changes irreversibly the structure of the tissue at the point of contact following an exposure period of 4 hours. This term does not refer to action on inanimate surfaces.

*Comment:* While the two codes both appear to apply to the storage of liquid chlorine at a mercantile occupancy, the Florida Building Code defers the regulation of outside storage to the Florida Fire Prevention Code, except for limiting the quantity. See FBC 414.6 for outside storage.

*FBC Section 414.6 Outdoor storage, dispensing and use.*

*The outdoor storage, dispensing and use of hazardous materials shall be in accordance with the Florida Fire Prevention Code (FFPC).*

Table 414.2.4 provides limits for both indoor and outdoor storage of hazardous liquids at mercantile facilities to 975 gallons with a maximum increase of 100% in Note f. of the table.

#### *Note f. to Table 414.2*

*f. Maximum quantities shall be increased 100 percent in outdoor control areas.*

Florida Fire Prevention Code - NFPA 1 Chapter 60 Table 60.2.6.5 establishes Maximum Allowable Quantities per Outdoor Control Area. This corrosive cap number is 500 Gallons. However, Chapter 64 allows a user to exceed the Table 60.2.2.1(b) limits by one of two methods:

**64.2.1 Location.** Outdoor storage of corrosive solids and liquids shall not be within 20 ft. (6.1m) of property lines, streets, alleys, public ways, means of egress to a public way, or buildings not used exclusively for the storage, distribution, or manufacturing of such materials, except as provided in 64.2.2.

**64.2.2 Distance Reduction.** An unpierced 2-hour fire-resistive wall extending not less than 30 in. (76 cm) above and to the side of the storage area shall be permitted in lieu of the distance specified in 64.2.1.