



3/22/24

Mo Madani
Technical Director
Building Codes and Standards Office
2601 Blair Stone Road
Tallahassee, Florida 32399
Mo.madani@myfloridalicense.com

Re: 2023 FLORIDA BUILDING CODE, EIGHTH EDITION

Dear Mo,

We have reviewed the proposed changes to the Florida building code, specifically section 454.1.6.5.16.6 (Ultraviolet light disinfectant).

Our primary concern with the proposed changes revolves around the supplemental disinfection allowance per NSF 50 – 2020 edition. If the code is to be changed to allow supplemental disinfection UV equipment, then our recommendation would be to require meeting the updated NSF 50 - 2023e code. This updated code requires supplemental UV systems to adhere to more stringent testing protocols, which in our opinion would be more suitable for commercial pools and spas.

Our recommendation for IWF (Interactive water features) and critical water bodies would be for secondary disinfection certification per NSF 50 – 2023e in which UV systems have been tested to confirm a minimum inactivation equivalent of 3 log (99.9%) *C. parvum* in accordance with NSF/ANSI/CAN 50 and the U.S. EPA UV DGM.21.

I would appreciate you adding this letter to the docket for the April 16th meeting.

Your sincerely,

Steve Pearce
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