

Declaratory Statement Report

Florida Building Commission

August 13, 2024

HILTON DAYTONA BEACH OCEANFRONT RESORT
100 NORTH ATLANTIC AVENUE, DAYTONA BEACH, FL 32118

Mechanical Technical Advisory Committee

DS2024 – 024 BY ROLANDO SOTO OF BROWARD COUNTY BOARD OF RULES AND APPEALS

Question 1: *Can a refrigeration system using an A2L refrigerant be designed installed using ASHRAE 15 -2019 if the Florida Building Code, Mechanical, 8th Edition (2023), Chapter 11 addresses said refrigerant and has more restrictive requirements?*

Answer: *The answer to the Petitioner's question is yes.* Pursuant to section 102.4 of the 8th Edition (2023) Florida Building Code (FBC), Building and since ASHRAE Standard 15 – 2019 provides for specific design and installation requirements for A2L refrigerant than that of Chapter 11 of the 8th Edition (2023) Florida Building Code, Mechanical, ASHRAE Standard 15 as referenced in section 1101.6 of the 8th Edition (2023) Florida Building Code (FBC), Mechanical is considered to be an integral part of the FBC, Mechanical. Designing and installation of A2L refrigerant using ASHRAE 15 would meet the minimum requirements of the 8th Edition (2023) Florida Building Code, Mechanical.

Question 2: *Can the A2L refrigerant quantity in an independent refrigerant circuit in a high-probability system exceed the amount for A2 refrigerants stated in Table 1104.3.2 of the Florida Building Code, Mechanical, 8th Edition (2023), Chapter 11 or in ASHRAE 15-2019, Table 7.1?*

Answer: *Answer to this question is not possible.* Table 1104.3.2 of the 8th Edition (2023) Florida Building Code, Mechanical and 7.1 of ASHRAE 15 – 2019 do not apply to A2L refrigerants.

Question 3: *Can an alternative method be used to design and install an independent refrigerant circuit in a high probability system that exceeds the amount of A2 or A2L refrigerant stated in Table 1104.3.2 of the Florida Building Code, Mechanical, 8th Edition (2023), Chapter 11?*

Answer: *The answer to the Petitioner's question is yes.* Pursuant to section 104.11 of the 8th Edition (2023) Florida Building Code (FBC), Building, the building official has the authority to accept alternative design to that of the prescriptive requirements of the code where he/she finds that the proposed design/alternative complies with the requirements of section 104.11 of the 8th Edition (2023) FBC, Building.

Question 4: *Can a refrigeration system be designed and installed using ASHRAE 15-2022 or Chapter 11 of the 2024 International Code as an alternative to the current FMC?*

Answer: This question is general in nature and falls outside the scope of this specific request. Also, see answer to question 3.

**Structural Technical Advisory Committee concurrent with
Special Occupancy Technical Advisory Committee**

DS2024-029 BY LEON WRIGHT OF DIXIE COUNTY

Question: *Are the unwalled/open structures in question (i.e., pole barns, gazebos, docks, platforms, boat shelters, and covers) required to comply with sections R322.2.1(5) and R322.3.2(4) of the 8th Edition (2023) Florida Building Code, Residential?*

Answer: *The answer to the Petitioner's question is no.* Unwalled/open structures (i.e., pole barns, gazebos, docks, platforms, boat shelters, and covers) are not required to meet the requirements of sections R322.2.1(5) and R322.3.2(4) of the 8th Edition (2023) FBC, Residential.