

Modification #:

Section 553.73, Fla Stat

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Section # 1711 and 332

Modification to the Florida Building Code.]:

FBCR

R332.1.1.1 Stainless steel. Where required by Table R332.1, fasteners shall be manufactured from ASTM A240 Type 304, Type 305, ~~or~~ Type 316 or Type 410 stainless steel.

FBCB

1711.1.1.1 Stainless steel. Where required by Table 1711.1, fasteners shall be manufactured from ASTM A240 Type 304, Type A305, ~~or~~ Type 316 or Type 410 stainless steel.

Reason: *The changes Meet the glitch criteria because as written conflicts are created between the code, code adopted standards and the Florida Product Approval System. The conflict is created where the code establishes a test requirement and excludes the only fastener material that can resist the load and remain viable in the coastal \environment. The code specifies impact resistant glazing or impact resistant covers for glazed openings in defined wind-borne debris regions. Impact resistant coverings (IRC) are required to be tested and to obtain a product approval number (FBC-R §R609.1, FBC-B §16091.2.3.2, §1709.9; ASTM 1996). The testing of impact resistant coverings includes impact tests and the IRC must remain in place after the impact test. As written, Sections 1711 and R332 exclude ASTM Type 410 stainless steel for fasteners. Most currently approved impact resistive coverings and systems utilize ASTM Type 410 stainless steel fasteners because of its strength. Other grades of stainless steel fasteners do not have sufficient strength to resist the impact testing required by the code or the Florida Product Approval System.*

The exclusion of ASTM Type 410 stainless steel renders the majority of impact resistant coverings currently approved for use in coastal environs noncompliant. More costly alternatives would be required with no improvement in public safety. ASTM Type, 410 stainless steel fasteners have almost double the strength of the ASTM Type 300 stainless steel series. Should one argue that the requested changes do not meet the strict definition of a glitch change, the Commission has approved such changes in the

past when denial would result in degrading public safety or in bad code, which this change certainly does when considering impact protection of glazed openings.

Fiscal Impact Statement [Provide documentation of the costs and benefits of the proposed modifications to the code for each of the following entities. Cost data should be accompanied by a list of assumptions and supporting documentation. Explain expected benefits.]:

- A. Impact to local entity relative to enforcement of code:** None.
- B. Impact to building and property owners relative to cost of compliance with code:** A potential reduction in cost because changing to more costly alternatives while not improving public safety is not required.
- C. Impact to industry relative to cost of compliance with code:** A potential reduction in cost because changing to more costly alternatives while not improving public safety is not required.
- D. Impact to small business:** The change has a major impact as excluding ASTM Type 410 stainless steel for fasteners in coastal environs would eliminate the use of many products currently listed in the Florida Product Approval System while potentially degrading public safety.

Please explain how the proposed modification meets the following requirements:

- 1. Has a reasonable and substantial connection with the health, safety, and welfare of the general public:** The change has a positive effect on public welfare and safety by including a stronger material for fasteners thereby allowing the continued use of Florida approved products in coastal environs.
- 2. Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction:** The change strengthens and improves the code by including a fastener material that is stronger allowing the continued use of products with a Florida Product Approval in coastal environs.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities: The change does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities.

3. Does not degrade the effectiveness of the code: The proposed change does not degrade the effectiveness of the code and improves the effectiveness of the code.