

From: Hebrank, Kari B. <KHebrank@carltonfields.com>
Sent: Monday, November 17, 2025 4:13 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>; Michael Bourré
<mbourre@bourreconstructiongroup.com>
Subject: LtrtoCommission.docx

[NOTICE] This message comes from a system outside of DBPR. Please exercise caution when clicking on links and/or providing sensitive information. If you have concerns, please contact your Knowledge Champion or the DBPR Helpdesk.

Gentlemen,

Please see the attached letter requesting rejection of Plumbing Code Modifications, MOD 11834 and MOD 11851 and instead maintain the current construction method known as “gapping” for cured-in-place pipe repairs.

Kindest regards,

Kari



Kari B Hebrank
Senior Government Consultant

215 S. Monroe St., Ste. 500
Tallahassee, Florida 32301-1866
Direct: 850.513.3607 | Fax: 850.222.0398

KHebrank@carltonfields.com | www.carltonfields.com
[bio](#) | [vcard](#)

Carlton Fields is ISO 27001:2022 certified

Confidential: This e-mail contains a communication protected by the attorney-client privilege or constitutes work product. If you do not expect such a communication please delete this message without reading it or any attachment and then notify the sender of this inadvertent delivery.



November 17, 2025

Mr. Michael Bourre
Chair, Florida Building Commission
Florida Department of Business & Professional Regulation
Building Codes & Standards
2601 Blair Stone Road
Tallahassee, FL 32399

RE: Code Modifications to Plumbing Code—MOD 11834 & MOD 11851

Dear Chairman Bourre,

The National Underground Utility Contractors Association of Florida (NUCA of Florida) respectfully requests that the Florida Building Commission reject Plumbing Code Modifications, MOD 11834 and MOD 11851 as these proposed code modifications would eliminate a proven construction technique known as “gapping” for cured-in-place piping (CIPP) that has been in place and utilized since the 1970’s and provides contractors and building owners with a cost-effective method for pipe repair. The main reasons for rejecting these modifications and retaining the ability to utilize the “gapping method” are outlined below.

I. Gapping is Currently an Accepted Construction Method

The “gapping method” of cured-in-place piping (CIPP) is currently an allowable construction method for repairing pipe and has been utilized for years nationwide and in Florida. We know that the Gapping Method of CIPP is a dependable, cost-effective, technically-sound and widely-utilized method for rehabilitating pipe—a “tried and true” method.

II. The Proposed Modifications Violate Florida Statutes

The proposed code amendment to prohibit the gapping method violates Section 553.73(9)(a)4 of the Florida Statutes, which explicitly state that a code amendment may not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities. The gapping method is just such a method of construction of demonstrated capability.

III. The Gapping Method Complies with ASTM F1743 and Section 706.2 of the Plumbing Code

Gapping restores 100 percent capacity flow and provides a 100 percent watertight seal in the repaired piping, thus preventing obstructions. In contrast, the alternative reinstatement method

Mr. Michael Bourre

November 17, 2025

Page Two

using a robotic cutting tool can lead to ledges and edges that are not 100% watertight and reduce the flow capacity by as much as 10 percent. This reinstatement method is arguably inconsistent with Section 706.2 of the Florida Plumbing Code, which dictates that “fittings shall not have ledges, shoulders or reductions capable of retarding or obstructing flow in the piping.”

IV. The Reinstatement Method Costs Twice as Much as Gapping Method and Has Greater Impact on Property and Building Owners

The machinery and equipment for robotic reinstatement cost in excess of \$100K, which is cost-prohibitive for small contractors and plumbers who currently are licensed to repair sewer and drainage pipes. The cost of the non-gapping reinstatement method to the end-user (building owner, remodeler, developer) is double or more the cost of using the gapping method. The increased compliance cost of the reinstatement method, along with the extended downtime based on the need for shut down of an entire building to allow full curing prior to reinstating pipe cuts, has a greater impact on property and building owners for facilities such as hospitals, nursing homes, condominiums.

V. Gapping Complies with the Performance and Workmanship Standards of ASTM 1743

Gapping provides a CIPP that is continuous over the entire length of the installation, per the workmanship standard of ASTM 1743. The intent of the ASTM 1743 workmanship standard is a CIPP liner that is “continuous throughout installation length,” i.e., the pipe portion that is damaged where the CIPP liner is installed to rehabilitate it, not “continuous” as to the entire length of the pipe system, including the parts that do not need repair or replacement. In other words, rehabilitating pipes does not require the CIPP liner to be installed in a single, continuous application from sewer to roof for every repair.

Moreover, ASTM standards are also not mandatory installation procedures, but rather are performance measures. But in any case, CIPP liners installed using the gapping method meet the ASTM 1743 performance measure.

In closing, for the multiple reasons listed, we urge the Florida Building Commission to maintain the gapping method as one of the “tools in the toolbox” for contractors and reject these proposals to limit reliable, well-known trenchless pipe rehabilitation practices.

Sincerely yours,

Matt Donnell

Matt Donnell, President
NUCA of Florida