



## Informal Interpretation Report Number 5266



**Date** August 01, 2007

**Edition** 2004

**Section** Work Area

### **Question:**

Is it the intent of FEBC Ch. 2 Definitions ? Work Area ? to apply to the actual affected area of the building as measured on a two-dimensional horizontal plane? As an example: A 7,500 sq. ft. two-story hotel structure with 20 rooms is undergoing a renovation to replace the exterior non-bearing walls with new exterior non-bearing walls. The new walls will consume the same area of the floor as the old walls (Four ea. 6 in. thick walls @ 150 l.f. =  $4 \times .5 \times 150 = 300$  sq. ft. affected area). However, the new walls will have new, rated impact glazing and doors. The structure will be gutted (carpet, gypsum board, etc.) except that all interior partition wall studs and all load-bearing elements will remain untouched (i.e. columns, headers, bar joist roof framing, roof, etc. will not be affected). The unit separation walls will remain untouched. Other work includes electrical conduits (100 sq. ft.), replacement plumbing lines (600 sq. ft.) and mechanical ductwork (800 sq. ft.). Total affected area  $300+100+600+800 = 1,800$  sq. ft. If one looks to FEBC Sec 305, he finds that a level 3 alteration would only apply when the work area exceeds 50% of the aggregate area of the building. Using this measurement methodology, the work area is only 1,800 sq. ft. and does not meet 50% of the aggregate area (3,750 sq. ft.). It appears that this would not be a level 3 alteration. This begs the question: ?When would one have a level 3 alteration?? Perhaps only when the entire roof structure is removed?

### **Answer**

This is an area that is not clearly defined and is left to the Authority Having Jurisdiction. While the final determination is up the Building Official, this appears to be a level III alteration. The work area is based on the calculation of the floor area of the structure involved in the alteration.

### **Commentary:**

Based on the description, this appears to be alterations of finishes and structural modifications, making it a level 3 alteration, but, it is the AHJ that needs to make the final decision based on the plans and scope of work. The removal and replacement of the exterior walls raises

questions, especially if going from non impact door and windows to impact rated doors and windows. Engineering evaluations will determine if the existing structural system will even handle the additional loads or structural work, or if this work may possibly increase the work area further.

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