



Informal Interpretation Report Number 6603



Date August 29, 2010

Edition 2007

Section 603.4

Question:

Is it the intent of FBC Mechanical Chapter 6 to prohibit painting exposed nonmetallic (rigid fiberglass) ducts?

Answer

The short answer to the question is maybe. If approved by the manufacturer, or the building official as alternate methods and materials with proper documentation.

Commentary:

While we have all seen ductwork that has paint on it, whether intentionally or accidentally, it does not mean that the Building Code allows it. The code is written to protect life and property. As such, the black and white of ink on paper may not always translate easily to the gray world in which we live. If a tested and labeled product is not used in accordance with that specific testing and listing, it cannot be approved without additional documentation. In many cases, owners and others do not understand the ramification of making changes to products that have been properly designed, installed and inspected. This may lead to required changes when the modifications are discovered. For example, once listed using a specific test, when asked for a letter addressing this issue, the testing lab issued a letter stating the board can not be painted because it was not tested with the paint. There could be other problems which are created when the board is painted that we are not aware of. Even if the paint meets the flame and smoke requirements, it may void the listing,

or warranty. Where duct is to be painted, installation of exposed metal duct may be an answer in the conditioned space. If it's exposed to the conditioned space, no insulation is required and the cost impact may be minimal.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.