



Informal Interpretation Report Number 7647



Date October 06, 2015

Edition 2014

Section NFPA 101

Question:

I own a single bedroom 4th floor condo. The building was erected in 1977, and included windows comprised of regular glass glazing and external wooden louvered jalousie shutters. The window/shutter combo is a single integral unit which will not allow replacement of only the shutters. The apartment has only the entry door, sliding glass to a small 4th floor balcony, and this window unit in the bedroom. Ingress/egress, and emergency exit through the window to the exterior corridor is impossible due to the shutters. I need to change my window due to rotting of the shutter blades, and I am told by local window vendors that even though the existing windows are grandfathered with respect to NFPA 101 (Life Safety Code) provisions regarding emergency egress since the building was put up in 1977, if I alter the existing window/shutter unit it must then comply with the current Code and allow emergency egress. Is this true?

Answer

No. 1. The requirement for EERO does not apply to units 4 stories or greater in height. 2. Replacement windows may be installed in accordance with the code in effect at the original construction and may be reduced by 5% per previously issued Declaratory Statement. The window will have to meet current code provisions for design pressure. The code also requires compliance with the FBC-EC Table C402.2 (C402.1.1).

Commentary:

Since this building is also governed by the Florida Fire Prevention Code, you may want to have a discussion with the Fire Plans Examiner in addition to this information. NFPA 101 is the base code for the Florida Fire Prevention Code (FFPC). CH31 Existing Apartment Buildings- Means of escape section 31.2.12. and 24.2.2.1.1 for Primary and Secondary means of escape may enter into the final decision.

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.