



**Informal Interpretation Report
Number 8358**



Date January 09, 2020

Edition 2017

Section various

Question:

Based on the definition found in Chapter 2: REPAIR. The reconstruction or renewal of any part of an existing building for the purpose of its maintenance or to correct damage, and
Per section 301.1 which states that a repair shall comply with one of the following methods:

301.1.1 Prescriptive compliance method

301.1.2 Work area compliance method

301.1.3 Performance compliance method

And, the Prescriptive and Work area compliance methods each have a section which states that while performing a repair, related work on nondamaged components that is necessary for the required repair of damaged components shall be considered part of the repair and shall not be subject to the requirements as appropriate for an alteration. (Section 404.1 for Prescriptive compliance method, Section 502.3 for Work area compliance method, respectively), and

Chapter 14 Performance Compliance Method contains section 1401.2 titled Alterations and Repairs, which states: "An existing building or portion thereof that does not comply with the requirements of this code for new construction shall not be altered or repaired in such a manner that results in the building being less safe or sanitary than such building is currently", and

Based on the definition found in Chapter 2: ALTERATION. Any construction or renovation to an existing structure other than a repair or addition. Alterations are classified as Level 1, Level 2 and Level 3, and

Based on the classification of work in Sections 502.2 and 502.3 for Repairs: Repairs shall comply with the provisions of Chapter 6. Reroofing shall comply with the provisions of Section 706 and Work on nondamaged components that is necessary for the required repair of damaged components shall be considered part of the repair and shall not be subject to the provisions of Chapter 7, 8, 9, 10, or 11.

Therefore, is it the intent of the Florida Building Code, Existing Building Edition to classify the reconstruction or renewal of any part of an existing building for the purpose of its maintenance or to correct damage, regardless of the cause or extent of the damage, as a repair?

If the answer to the above question is "yes", additionally, based on the definitions of Alteration and Repair, is it the intent of the Florida Building Code, Existing Building Edition, that while performing said repair, which by definition is the reconstruction or renewal of any part of an existing building for the purpose of maintenance or to correct damage, regardless of the cause or extent of the damage, or while performing work on nondamaged components that is necessary for the required repair of damaged components, regardless of the extent of the related work on nondamaged components, that there is no degree or extent of repair or related work that would expand or elevate the described repair or related work into being considered an alteration?

Answer:

No, roof repairs are an exception. Each code book requires considering all requirements in their totality. A specific requirement always supersedes general requirements. See 706.1 and 706.1.1 limiting roof repairs to 25 percent of a roof section in one year.

On 01/09/2020 at 1:13 PM

Commentary:

None.

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.