



**Informal Interpretation Report
Number 8467**



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Edition 2017

Section 607.1

Question:

Is it the intent of the last sentence of 607.1, which reads "In nonresidential occupancies, hot water or tempered water shall be supplied for bathing and washing purposes," to require non-public lavatories (lavatories considered private - confined in a classroom) in a public school to have hot or tempered water delivered from them?

Answer

Yes, these locations are considered public based on definition

Commentary:

By definition, bathrooms located within public school classrooms are still considered public, not private, by both the plumbing code and the accessibility code. And although Section 607.1, FBC-Plumbing requires hot water (110 F or greater) in residential occupancies, it provides the option of supplying either hot water or tempered water (85 F – 110 F) for bathing and washing purposes (including hand washing) in non-residential occupancies such as schools.

Section 416.5, FBC-Plumbing specifically requires that only tempered water “be delivered from lavatories and group wash fixtures located in public toilet facilities provided for customers, patrons, and visitors.” Tempered water must be delivered by an approved water-temperature limiting device conforming to ASSE 1070. Furthermore, Section 453.16.6, FBC-Building - State Requirements for Educational Facilities (SREF) - also requires a mixing valve be installed at hand-washing lavatories, in order to control the temperature “which shall not exceed 110 F.”

It should be noted that in the upcoming 7th Edition FBC, Section 419.5 (renumbered) will permit the use of cold water as well as tempered water for public hand-washing facilities. Recent scientific studies, including CDC, have proven that the water temperature for hand-washing has no impact on the removal of bacteria. And further research has shown that the average cold water temperatures in Florida water distribution mains range from approx. 68 F to 75 F, perfectly suitable for hand-washing.

Bottom line, the current code prohibits cold water to public hand-washing lavatories, but the next code will

allow it.

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.