

In the new 2006 edition of the Florida Fire Prevention Code (FFPC): 101, section 4.6.8 Modernization or Renovation no longer exists. It has been replaced with section 4.6.7 Building Rehabilitation and now any rehabilitation work on an existing building "shall be classified as one of the following categories in accordance with section 43.2.2.1:"

Where rehabilitation work to an existing fire alarm system is sub-classified as a "renovation", "modification" or "addition," the newly installed fire alarm components shall then comply with the requirements of FFPC: 101 (2006 edition) Chapter 43 applicable to the respective sub-classification of the rehabilitation work.

Keep in mind though, regardless of the scope of rehabilitation work, the "untouched" portions of the existing fire alarm system shall comply with the sections of the FFPC: 101 (2006 edition) applicable to "existing occupancies" for that particular type of occupancy as determined by the local AHJ (see FFPC: 101, section 43.1.2.1). Any code parameter applicable to "existing occupancies" for that particular type of occupancy as required by FFPC: 101 (2006 edition) shall be:

- shown to be compliant by means of providing information with the permit submittal documents that specifically identifies what is in place at the existing building that serves to satisfy the particular requirement(s) or...
- remedied by the fire alarm contractor, as evidenced and outlined in the permit submittal documents provided at the time of the permit submittal or...
- addressed with a letter that is to be provided with the permit submittal - authored by the fire alarm contractor and addressed to the local AHJ - specifically describing the existing condition(s), requesting that the condition(s) be allowed to continue as is, and requesting written acknowledgement from the local AHJ to grant permission for the existing condition(s) to be allowed to continue as is. This letter will then be required to be included with the plan submittal permit documents. We need letter from AHJ outlining any approval of deviations!

## Existing Occupancy Code Compliance Criteria

Regardless of the scope of fire alarm rehabilitation work proposed (*except where there is a change of occupancy, a reconfigured fire alarm system or in some cases a change of use, which will require the "building" fire alarm system and components to comply with the requirements applicable to "new construction" for the respective occupancy classification*) all existing buildings are required to comply with all the fire alarm-related provisions outlined in the FFPC: 101 (2006 edition) for the respective existing building occupancy classification pursuant to section 43.1.2.1.

As such, at the time any permit application for fire alarm rehabilitation work is submitted, a determination must be made as to whether the existing building complies with the specific FFPC: 101 (2006 edition) fire alarm-related requirements for the respective existing building occupancy classification. To that end, the existing occupancy's fire alarm-related existing conditions must be specifically identified and shown by the permit applicant to comply with or not comply with the specific FFPC: 101 (2006 edition) fire alarm-related requirements for the respective existing building occupancy classification.

Typically, the specific fire alarm-related requirements are found in the respective existing occupancy chapter subsections ".....3.4.1, .....3.4.2, ..... 3.4.3, ..... 3.4.4, ..... 3.4.5, ..... 3.4.6, ..... 3.4.7, ..... 3.4.8". (For example in an existing apartment building, fire alarm "Initiation" requirements can be found in subsection 31.3.4.2, but subsection 31.3.4.2 also has additional subsections 31.3.4.2.1 through 31.3.4.2.5 and this may not be the case in other existing occupancy chapter sections, so please be diligent in your perusal of the respective code requirements.) However, please note that there may also be - and often times are - other sections of the respective Existing Occupancy Chapter that do not fall under subsections ".....3.4.1 through .....3.4.8", but that still may apply to existing fire alarm systems and which may actually reference requirements in Chapters 1 through 4 and Chapters 6 through 11 of the FFPC, such as smokeproof enclosure requirements of subsections 7.2.3 for example, or the interfacing of special locking mechanisms/systems with the fire alarm system as outlined in 7.2.1.6, or elevator requirements, etc.

Therefore, when submitting a permit application for fire alarm rehabilitation work, please provide on fire alarm contractor company letterhead the information as outlined in the following guidelines - signed by fire alarm contractor, fire marshal (or designee) and building owner (or owner's representative) - and include with submittal:

# "Existing Occupancy Code Compliance Guide"

(PLEASE NOTE THE FOLLOWING INFORMATION IS REQUIRED TO BE PROVIDED ON FIRE ALARM CONTRACTOR COMPANY LETTERHEAD, ADDRESSED TO THE LOCAL JURISDICTIONAL FIRE MARSHAL AND SIGNED BY FIRE ALARM CONTRACTOR, THE FIRE MARSHAL (OR DESIGNEE) AS WELL AS THE BUILDING OWNER (OR OWNER'S REPRESENTATIVE)

Occupancy type: \_\_\_\_\_ (as defined in FFPC: 101, 2006 edition, Chapter 3 - Definitions)

Occupancy chapter: \_\_\_\_\_ (as referenced in FFPC: 101, 2006 edition)

- For Existing Detention and Correctional Occupancies (Chapter 23)  
Use Condition I: \_\_\_\_\_ Use Condition II: \_\_\_\_\_ Use Condition III: \_\_\_\_\_  
Use Condition IV: \_\_\_\_\_ Use Condition V: \_\_\_\_\_
- For Existing Apartment Occupancies (Chapter 31)  
Option 1: \_\_\_\_\_ Option 2: \_\_\_\_\_ Option 3: \_\_\_\_\_ Option 4: \_\_\_\_\_
- For Existing Mercantile Occupancies (Chapter 37)  
Class A: \_\_\_\_\_ Class B: \_\_\_\_\_ Class C: \_\_\_\_\_
- For Existing Industrial Occupancies (Chapter 40)  
General: \_\_\_\_\_ Special Purpose: \_\_\_\_\_ High Hazard: \_\_\_\_\_
- For Existing Storage Occupancies (Chapter 42)  
Low Hazard: \_\_\_\_\_ Ordinary Hazard: \_\_\_\_\_ High Hazard: \_\_\_\_\_

Occupancy load: \_\_\_\_\_ (show occupant load calculation breakdown using FFPC: 101, 2006 edition, Table 7.3.1.2 - Occupant Load Factors)

Number of Stories? \_\_\_\_\_ Building Height? \_\_\_\_\_

Square Footage? \_\_\_\_\_ (Per floor and building total).

With respect to subsection ".....3.4" Detection, Alarm and Communication Systems in each of the respective Existing Occupancy Chapters 13, 15, 17, 19, 21, 23, 24, 26, 29, 31, 33, 37, 39, 40 and 42, please provide the detailed information requested below relative to each of the additional subsections that may follow subsection ".....3.4":

The following requirements are typical for each of the existing occupancy additional subsections listed herein and which may follow subsection ".....3.4":

GENERAL, INITIATION, EMERGENCY FORCES NOTIFICATION (where applicable), FIRE SAFETY FUNCTIONS (where applicable), DETECTION (where applicable), SMOKE ALARMS (where applicable), and SMOKE DETECTION SYSTEMS (where applicable)

- Specifically identify each additional fire alarm-related code subsection referenced in the particular additional subsection.
- I identify whether the existing building complies with the respective additional subsection requirement(s), and if so, specifically identify what is in place at the existing building that serves to satisfy the particular requirement(s).
- If the existing building does not comply with the respective additional subsection requirement(s), then will this deficiency or deficiencies be remedied at the time of this fire alarm permit submit for rehabilitation work? If so, permit documents shall fully reflect this.
- If the existing building does not comply with the respective additional subsection requirement(s) and this deficiency WILL NOT be remedied at the time this fire alarm permit is submitted for rehabilitation work...
  - and the intention is to have the local jurisdictional fire marshal allow this deficient condition(s) to continue, then within the body of the fire alarm contractor authored letter that is to be provided with the permit submittal documents, describe the existing condition(s), request that the condition(s) be allowed to continue as is, and request written acknowledgement from the local AHJ to grant permission for the existing condition(s) to be allowed to continue as is. This letter of approval from the AHJ outlining any deviations is necessary and mandatory!
  - and the local jurisdictional fire marshal determines that a specific condition will not be allowed to continue "as is", but agrees to a level of compliance that may fall short of or that may fully comply with a respective existing occupancy code section requirement, then again, within the body of the fire alarm contractor authored letter that is to be provided with the permit submittal documents, describe the existing condition(s), outline the "level of compliance" agreed to by the building owner and the fire marshal for the specific condition, set the time frame for the completion of such work, and request written acknowledgement from the local AHJ to grant permission for the existing condition(s) to be remedied as outlined in the letter. This letter of approval from the AHJ outlining any "agreed to" levels of compliance for specific deficiencies is necessary and mandatory!

The following requirements are typical for each of the existing occupancy additional subsections listed herein and which follow subsection ".....3.4":

NOTIFICATION and OCCUPANT NOTIFICATION(where applicable)

- The requirements for existing occupancy additional subsections relative to these two particular subsections are the same as those typical requirements outlined above, but with the following additional caveat:
  - NOTE: when a specific existing occupancy chapter section has dwelling units or sleeping areas involved and the specific existing occupancy chapter section requires occupant notification to be in compliance with 9.6.3, then 75dBA at the pillow is required pursuant to NFPA 72 (2002 ed.) section 7.4.4.1. As such, a current sound pressure level reading in several of the typical existing dwelling unit sleeping areas will be required to be established and recorded on the permit document drawings, as well as on any letter to the AHJ when requesting approval of a condition to

continue "as is" or when requesting the AHJ to determine the "level of compliance" required, particularly if the existing sound pressure level readings DO NOT achieve 75dBA at the pillow.

PLEASE NOTE that there may be other subsections (*where applicable and other than what is called out in subsections ".....3.4.1" through ".....3.4.8"*) in the respective existing occupancy chapters where reference is made to Chapters 1 through 4 and Chapters 6 through 11 of the FFPC, requiring compliance involving other fire alarm-related components. For example: smokeproof enclosure requirements outlined in subsection 7.2.3; or the door-release requirements outlined in subsection 7.2.1.6; or elevator requirements outlined in subsection 7.2.13; or other Building Services fire protection requirements for Utilities (section 9.1), Heating, Ventilating and Air-Conditioning (section 9.2), Smoke Control (section 9.3), Elevators, Escalators and Conveyors (section 9.4) and Rubbish Chutes, Incinerators and Laundry Chutes (section 9.5)

- If the existing occupancy chapter requires compliance with any of the referenced sections (Chapters 1 through 4 and Chapters 6 through 11 of the FFPC) then please specifically identify each of these additional subsection code references.
- The remaining requirements for existing occupancy additional subsections relative to other fire alarm-related components as referenced in sections (Chapters 1 through 4 and Chapters 6 through 11 of the FFPC) are the same as those typical requirements outlined above.