



# Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,  
"Organization" (§633.026)

## **Informal Interpretation Request**

**Date:** 8/15/2023

**NFPA Document Number:** NFPA 13, 2016 Edition.

**Paragraph Reference:** Chapter 8, 8.1.1(1)

*Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above: **Additional cost to install sprinkler is approximately \$9000. We have been in building for 17 years and over 25 inspections. No Marshall came up with new interpretation.***

*Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered: **This standard contemplates full sprinkler protection for all areas including walk in coolers, freezers, bank vaults etc.***

*Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation: **This cooler was installed in 2006 and after 17 years of business in the same building the fire marshal interprets this new idea. Adding sprinklers to the outside cooler attached to our building would cost Approximately \$9000.00 because it's after the fact. My beer cooler inside the building has sprinkler as code states but not my outside food cooler.***

*Explain how the Petitioner's substantial interests are being affected by the question below: **This change has a cost of approximately \$9000.00. We passed all codes when we built this restaurant and now after the fact, they require us to install sprinklers in a building I rented for 17 years.***

*Enter the Petitioner's question concerning an interpretation of the FFPC: **I question the interpretation of NFPA 13. The fire inspector notes that in 8.1.1 (1) sprinklers shall be installed throughout the premises of our restaurant. Our cooler is outside the premises other than the door to enter our kitchen. There is an 8" block wall between the kitchen and the cooler with a metal insulated door. My premise is that the cooler is safe. This was installed in 2004 and no changes have occurred since built. We passed all inspections and now the request to change this after 18 years and no previous violations.***

*I believe 8.1.1(1) should only be applied in case where cooler is inside the building. I have a beer cooler inside the restaurant, and it has sprinklers as required. Please understand we are a business of 18 years and continue to do our best in Polk County.*

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Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: [www.FFMIA.org](http://www.FFMIA.org) | Email: [info@ffmia.org](mailto:info@ffmia.org) | [http://www.myfloridacfo.com/sfm/bfpr/bfpr\\_index.htm](http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm)



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*My specific question is does the code require retroactively that a cooler connected to a sprinklered building also be sprinklered?*

*Committees' majority vote: Yes*

*The addition of an outside cooler connected to a building is part of the building and needs to be protected as such. The NFPA standard in affect in 2006 was NFPA 13, 1999 Edition with the same language as the current 2016 edition. As explained by Formal Interpretation 78-6, these areas require sprinklers because they are part of the premises. NFPA 13 requires that sprinklers be installed throughout the premises in accordance with Section 4-1.1. There are no exceptions provided which allow for sprinkler omission in these areas.*

[https://www.nfpa.org/assets/files/aboutthecodes/13/13-1999\\_faqs.pdf](https://www.nfpa.org/assets/files/aboutthecodes/13/13-1999_faqs.pdf)

**Region 1** - Delegate: Byron Bennett, North Bay Fire Control District  
Alternate: William (Michael) Hall, Marianna Fire Rescue

**Region 2** - Delegate: Jason R. Greisl, Tallahassee Fire  
Alternate: Vacant

**Region 3** - Delegate: James Groff, Jacksonville F. R. (Committee Chair)  
Alternate: Silver Chip Ware

**Region 4** - Delegate:  
Alternate: Karl Thompson

**Region 5** - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department  
Alternate: Christina Diaz, Seminole County Fire Department

**Region 6** - Delegate: Robert Salvaggio, Cape Coral Fire Rescue  
Alternate:

**Region 7** - Delegate: (Kenneth) Sean Brown, Broward Sheriff fire Rescue & emergency Services  
Alternate: Rebecca Geimer Tamarac Fire Rescue

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