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**MEMO**

**TO:** All Building Officials in Miami-Dade County  
**FROM:**  Secretary of the Board  
Board of Rules and Appeals (BORA)  
**DATE:** June 24<sup>th</sup>, 2015  
**SUBJECT:** BORA Interpretation - 2010 Mechanical – Section 604.6 / Penetration of Assemblies  
2010 Building – Section 713.3.1.2 / Penetration of Fire Stop Systems

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On June 18, 2015, the Board of Rules and Appeals considered an interpretation request from the Building Official of the City of Sweetwater with regards to the possible conflict between a Florida Building Code section and the installation specifications of a listed firestop system.

The Florida Building Code (FBC), Mechanical Volume Section 604.6 *Penetration of assemblies*, prohibits the penetration of fire rated walls with covered ducts. However, in Section 607.5.3 *Fire partitions* of the FBC, Mechanical Volume, requires that duct penetrations through fire rated walls must be protected with fire dampers. Nevertheless, this section lists three options as exceptions to fire dampers. One of the exceptions relating to omission of the fire damper installation entails compliance with Building Section 713.3.1.2 *Through-penetration firestop system*. This Section requires the through penetration of a fire rated wall to be protected by an *approved* firestop system installed and tested in accordance with ASTM E 814 or UL 1479. The question before the Board was which of these Sections are applicable.

The Board resolved the issue based upon reliance on Section 102.1 of the FBC, Building Volume shown below:

**102.1 General.**

***Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall be applicable. Where, in any specific case, different sections of this code specify different materials, methods of construction or other requirements, the most restrictive shall govern.***

In doing so, the Board interpreted that the prescribed installation instructions contained in the proposed listed and tested firestop system of Section 713.3.1.2, which includes blanket insulation through the penetration in the approved system, is more restrictive and specific to this type of application.

If you have any additional questions on this matter, please contact Amador Barzaga, Training and Certification Officer at (786) 315-2559.