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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: December 23<sup>rd</sup>, 2014

SUBJECT: BORA Interpretation – Walk-in Freezers as Occupiable Space

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At their meeting of December 18, 2014, the Board was asked to interpret the provisions of occupiable space as defined in the Florida Building Code, Building volume. Specifically, the Board was requested to determine if a factory built walk-in freezer/cooler is occupiable space, subject to Chapter 10, interior space dimensions and floor elevations. The subject Section is shown below:

**Section 202**

**OCCUPIABLE SPACE.** *A room or enclosed space designed for human occupancy in which individuals congregate for amusement, educational or similar purposes or in which occupants are engaged at labor, and which is equipped with means of egress and light and ventilation facilities meeting the requirements of this code.*

The Board concluded factory built walk-in freezer/coolers are equipment. This assessment is supported by the International Building Code Interpretation Number 04-05. The Board inferred this interpretation is also applicable to factory built walk-in freezer/coolers.

As a result, the Board established that factory built walk-in freezer/coolers are a piece of equipment and not a building or structure intended for human occupancy. Consequently, factory built walk-in coolers which are not designed to be normally occupied, used only by employees familiar with the space and not open to the public be deemed as equipment not subject to compliance with egress, interior space dimensions and floor elevations.

Should you have any questions, please contact Mr. Eduardo Fernandez, Training and Certification Officer, at (786) 315-2556 for additional information.

cc: Michael Goolsby, Director, Board and Code Administration Division