



**ORANGE COUNTY PUBLIC SCHOOLS
BUILDING CODE COMPLIANCE OFFICE
CODE INTERPRETATION**

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Subject Title: HVAC equipment replacement requirements
Applicable Code: Florida Building Code (Building/Energy Conservation)
Date: 6/30/21
Revised: N/A

Question: Is a plan review process required and does the FBC Energy apply to mechanical equipment replacement projects?

Answer: FBC Section 107.3.5 exempts the requirement of plan examination for “replacing existing equipment such as mechanical units...” The FBC Energy exempts applicability of the energy code for existing buildings that are not defined as renovated buildings.

Comment: The replacement of mechanical units is specifically identified as being exempted from the plan examination requirements. It would not apply to replacement of mechanical systems or ductwork or any mechanical work that is not deemed a mechanical unit replacement. Further, it does not exempt the requirement of pertinent document submission including those required for compliance with the FBC such as site and floor plans indicating location of work, safety plan and required anchoring information. It only exempts the plan review process.

Regarding mechanical equipment compliance with the energy code, FBC Energy Section C101.4.2 states that energy code compliance is not required for existing buildings except ones which are considered to be renovated buildings. The definition of a renovated building according to Section C202 is “A residential or nonresidential building undergoing alteration that varies or changes insulation, HVAC systems, water heating systems or exterior envelope conditions, provided the estimated cost of renovation exceeds 30 percent of the assessed value of the structure.”