



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

6501 Magic Way, Building 100C
Orlando, Florida 32809
Telephone (407) 317-3794
Fax (407) 317-3950

Subject Title: Public vs Private Plumbing Fixtures
Applicable Code: Florida Building Code (Energy) Section C404
Date: November 22, 2019
Revised: N/A

Question: For the purposes of determining the maximum allowable pipe length supplying hot or tempered water to lavatories in single occupant toilet rooms located in classrooms, are said rooms considered public or private?

Answer: To arrive at the answer to this question you must analyze the specific definitions of private and public utilization of fixtures in the Florida Building Code Plumbing and look at other sections describing examples of each scenario. Ultimately, the interpretation is that they are considered private.

Comment: The code defines Public or Public Utilization in the following manner:

“In the classification of plumbing fixtures, public applies to fixtures in general toilet rooms of schools, gymnasiums, hotels, airports, bus and railroad stations, public buildings, bars, public comfort stations, office buildings, stadiums, stores, restaurants and other installations where a number of fixtures are installed so that their utilization is similarly unrestricted.” Conversely, private is defined as “In the classification of plumbing fixtures, private applies to fixtures in residences and apartments, and to fixtures in nonpublic toilet rooms of hotels and motels and similar installations in buildings where the plumbing fixtures are intended for utilization by a family or an individual.”

Elsewhere in the plumbing code such as sections 403.1.3 Potty parity, 403.3 Required public toilet facilities and 403.3.1 Access, all of these sections refer to public toilet rooms as having multiple occupant allowances where access to said rooms are unrestricted. Similarly, private toilet rooms contain allowances for single users only with ability to lock the door thereby restricting access to said room.

So pertaining to schools, can there be toilet facilities that are considered private even though the school is open to the public? The answer is yes because even in the definition of public utilization, the term general toilet rooms is used as opposed to all toilet rooms; general referring to those facilities that are utilized by multiple individuals with unrestricted access.