

FAX COVER SHEET

DATE: November 20, 2006

TO: Mr. Mo Madani
State of Florida
Florida Building Codes

FLORIDA BUILDING CODE DEPARTMENT
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Miami, Florida 33150-3000
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FROM: Cindy
Cindy

[Signature]
Sharon E. Jones
Deputy Agency Clerk

11/27/06
Date

RE: DCA 06-DEC-270

Request for Declaratory Statement Code Section 507.2.2 Florida Existing Building Code and, if possible, Florida Product Approvals

NUMBER OF PAGES INCLUDING THIS COVER SHEET: 3

First, let me thank you for your prompt response and your assistance. I will try to briefly set out my questions or interpretations. Please feel free to correct any missteps in my reading or interpreting the Codes. We are bidding a one story reroofing project in an Exposure B location in a wind speed zone - 3 second gust - of 130 miles per hour.

Code Section 507.2.2 of the 2004 Florida Existing Building Code states:

"Where roofing materials are removed from more than 50 percent of the roof diaphragm of a building or section of a building where the roof diaphragm is a part of the main windforce-resisting system the integrity of the roof diaphragm shall be evaluated and if found deficient because of insufficient or deteriorated connections, such connections shall be provided or replaced."

The evaluation of the connections would be checking the type, size and placement of the fasteners which attach the roof sheathing to the structural supports to insure compliance with current codes which is a simple task once the old roofing is removed. The installation of additional nails or screws (when the sheathing is wood) is not an expensive or onerous task. The State of Florida instituted mandatory advanced core courses as part of the continuing education requirements in an effort to force licensed contractors to learn and understand the current code provisions.

The Codes in question appear to be straight forward to me and are most logical as the state wide code is meant to increase hurricane resistance and decrease storm damage to persons and property. The only reasonable time that existing roof sheathing can be attached to the structural members in accordance with the more stringent code requirements is during a roof replacement. The added labor and material costs are minimal considering the probable reduction in property damage and personal injury much less reducing insurance costs.

Enforcing stringent roofing codes to meet severe wind uplifts to roof sheathing that is not adequately attached to the structure serves no purpose as the failure will occur at the inadequately attached roof sheathing.

The Miami-Dade Approvals and Factory Mutual approvals are specific as to deck materials and deck attachment in most instances. Underwriters Laboratory are specific as to roof sheathing attachment on architectural metal roofing but do not address the attachment of metal roof decking or plywood roof sheathing on low sloped roofing assemblies. The newer Florida Approvals provided by engineers typically disclaim any analysis of the roof sheathing or roof sheathing attachment.

Code Section 303.1 of the 2004 Florida Existing Building Code defines roofing as a Level 1 Alteration which is the removal and replacement or the covering of existing materials, elements, using new materials that serve the same purpose.

Code Section 303.2 of the 2004 Florida Existing Building Code requires that Level 1 Alterations shall comply with the provisions of Chapter 5 of the 2004 Florida Existing Building Code.

Code Section 511.1 of the 2004 Florida Existing Building Code requires that materials and methods of application used for recovering or replacing an existing roof covering shall comply with the requirements of Chapter 15 of The Florida Building Code - Building.

Code Section 1504.1 of the 2004 Florida Building Codes - Building Performance Requirements - Wind resistance of roofs. Roof decks and roof coverings shall be designed for wind loads in accordance with Chapter 16.

Code Section 1609.6 of the 2004 Florida Building Codes - Building provides simplified provisions for buildings with a mean roof height not exceeding 60 feet or a roof height not exceeding the least horizontal dimension of the building, whichever is less.

Tables 1609.6B, C, and D in the 2004 Florida Building Codes - Building provides the wind uplifts for different wind speed locations given the wind zone, height and slope of a given structure and referring to the wind map provided as Figure 1609 one can readily ascertain the uplift forces.

Figures 1609.6B and 1609.6C in the 2004 Florida Building Codes - Building provides roof zone diagrams which are relatively simple, however the printing on the diagrams on pages 16.23 and 16.24 of my code book is of very poor quality and difficult to read.

Table 2304.9.1, Fastening Schedule in the 2004 Florida Building Codes - Building, entry Number 31, presents the required plywood roof sheathing fastening requirements. The reference number 1609.2(c) provided in the last line in the column "Location" at entry 31 is incorrect and probably should be 1609.6C. This reference error could easily have occurred during the most recent updates to the Florida Codes.

Does Code Section 507.2.2 of the 2004 Florida Existing Building Code mean that roofing contractors must check for the deck attachment to the structure if 50% of the roof, or 50% of any area of the roof is removed and provide additional nailing if needed?

If the Florida Product Approval is based on a BCCO Notice of Acceptance which is specific as to deck material and deck attachment can a roofing contractor rely on the Notice of Acceptance for the roof deck attachment to the structure?

With the proper advanced courses and certificates can a licensed roofing contractor evaluate residential roof decking using chapters 16 and 23 of the Florida Building Codes if the residence is no greater than two stories and is located in an Exposure B?

New Questions related to Florida Product Approvals

If the Florida Product Approval is provided by a Florida registered architect, or engineer, or testing laboratory which disclaims any analysis of the appropriate roof decking and roof deck attachment must a licensed roofing contractor engage a Florida registered architect or engineer for an analysis of the roof deck material and roof deck attachment for reroofing (if more than 50% of the roofing is removed or 50% of any roof area) and for new construction?

When the Florida Product Approval is provided by a Florida registered architect, engineer, or testing laboratory that used test data (uplift resistance values) from a specific Factory Mutual or U.L. uplift test to calculate uplift resistance values, must the roofing system currently being installed then mirror the conditions of the specific tested assembly used by Factory Mutual or U.L.? The uplift values of these individual and numbered tests provide uplift values relied upon by the Florida registered architect, engineer or laboratory. If this is the case, how does the average roofing contractor know how the FM or UL testing was performed?

Can you also please confirm that if the Florida Building Code Product Approval is based on a BCCO Notice of Acceptance the requirements stated in the Approval must be followed to be a wind rated assembly?

FAX COVER SHEET *DC 706-DEC-270*

DATE: October 18, 2006

TO: Mr. Mo Madari
State of Florida
Florida Building Codes

FROM: Cindy

RE: Request for Declaratory Statement Code Section 507.2.2, Florida Existing Building Code

NUMBER OF PAGES INCLUDING THIS COVER SHEET: 3

FILED AND ACKNOWLEDGEMENT
FILED on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.

Paula P. Ford 10/18/06
Paula P. Ford
Commission Clerk

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