



DS 2021-007

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**Petition for Declaratory Statement
Before the Florida Building Commission**

Petitioner:

Company: Sdii Global Corporation
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Statute(s), Agency Rule(s), Agency Order(s) and/or Code Section(s) on which the Declaratory Statement is sought:

Portions of Chapters 4 and 7 of the Florida Building Code – Existing Building, 7th Edition (formerly Chapters 5 and 7 of the Florida Building Code – Existing Building, 6th Edition).

Background:

Sdii Global Corporation (SDII) is a forensic engineering firm that specializes in investigating the cause and origin of property damage, including the cause and origin of roofing system failures in the State of Florida. As part of these roof investigations, SDII is often asked to comment on whether the Florida Building Code (FBC) permits the repair of the damaged portions of the roofing system or if it requires the replacement of the entire roof section to conform with the current edition of the FBC.

To address this question, SDII would cite Section 706 Existing Roofing of the FBC – Existing Building, 6th Edition, which governed the requirements for repair, recovering, or replacement of existing roofs until the 7th Edition of the FBC was adopted. Regarding roof coverings, Section 706.1.1 of the FBC – Existing Building, 6th Edition read:

Not more than 25 percent of the total roof area or roof section of any existing building or structure shall be repaired, replaced, or recovered in any 12-month period unless the entire existing roofing system or roof section is replaced to conform to requirements of this code.

With the adoption of the FBC – Existing Building, 7th Edition, SDII understands that the language of Section 706.1.1 remains unchanged.

SDII would also cite Section 502.3 Related Work of the FBC – Existing Building, 6th Edition, which read:

Work on non-damaged components that is necessary for the required repair of damaged components shall be considered part of the repair and shall not be subject to the provisions of Chapter 7, 8, 9, 10 or 11.

According to this section, non-damaged roof components removed and reinstalled as part of the repair of damaged roof components were not counted toward the 25 percent threshold stated in Section 706.1.1.

Section 502.3 Related Work was omitted from the FBC – Existing Building, 7th Edition. We have not been able to locate similar language in other sections of the 7th Edition of the FBC.

Situation:

SDII completed an evaluation of a roofing system where it was determined that damaged roof cladding along the rake edge of the roof required repair. The area requiring repair equated to 5 percent of the roof section area. The repair method selected involved removal and replacement of non-damaged components upslope of the damaged components, which added an additional 25 percent of the roof section area to the repair area. The area of damaged components plus non-damaged components made the repair area 30 percent of the roof section area, which exceeds the 25 percent threshold stated in Section 706.1.1. Refer to Figure 1.

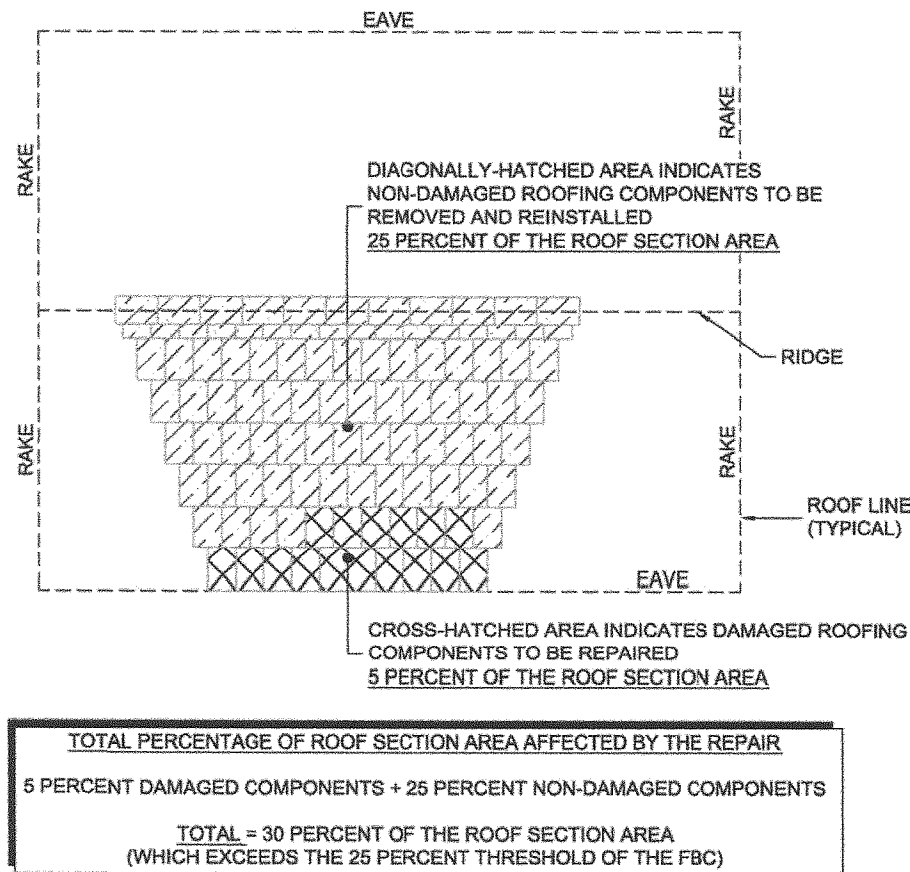


Figure 1

Question:

When determining if a roof repair exceeds the 25 percent threshold specified in Section 706.1.1 of the 7th Edition of the FBC – Existing Building, should work on non-damaged components still be omitted from the repair area calculation?

Summary:

SDII has reviewed pertinent sections of the FBC and respectfully believes that the answer to the question is “YES.” We do not believe that the intention of the FBC is to burden the property owner with unnecessary costs for repair. If the removal and reinstallation of non-damaged components are counted toward the 25 percent threshold stated in Section 706.1.1, a relatively small roof repair could trigger a complete roof section replacement, depending on the area of non-damaged roofing components removed and reinstalled as part of the repair.

If the answer is “NO” and work on non-damaged components is intended to be counted toward the 25 percent threshold, then the area of the roof that requires repair becomes subjective and is not necessarily quantifiable. The result is that the repair of a roof that sustained a relatively small area of damage can necessitate removal and reinstallation of non-damaged components, triggering the 25 percent threshold stated in Section 706.1.1, and thereby requiring full replacement of an otherwise competent roofing system.

It is the opinion of SDII that the intention of the FBC is not to require unnecessary work and costs and that the omission of Section 502.3 Related Work from the FBC – Existing Building, 7th Edition presents the potential for unintended consequences to the property owner.

Please do not hesitate to call if there are any questions, comments, or concerns.

Respectfully Submitted,
SDII GLOBAL CORPORATION
4509 George Road, Tampa, Florida 33634
FBPE Registry No. 8778



Chris Casagrande
Owner and Chief Financial Officer