

## PETITION for DECLARATORY STATEMENT

Before the Florida Building Commission

Petitioner:

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2009 supplement to the 2007 Florida Building Code, Chapter 15, Section 1504.3.1

I am a State of Florida Certified Roofing Contractor and I am in the process of providing a roofing quotation for a project located in Palm Beach County, wind zone of 140, exposure C, category II building, roof mean height of 32 feet, and roof slope of 5/12. The specifications require the use of an adhesive set roof tile system over a "self-adhering" cap sheet over an ASTM D226 Type II anchor sheet. While performing the calculations for the resistance required for the site, the HIP roof design requires 31.80 ft-lbf.

In reviewing the product approval for the "Self-Adhering" underlayment FL#5259, it was noted that there is NOT a resistance value listed or "limitation of use" for the Structural Uplift Resistance Rating (section 5.5.3 of ERD report).

Also reviewing the test standards and code language for "Other Roof Systems" under section 1504.3.1, I would request a declaratory statement on the following concerns:

For the project in question and in accordance with FBC Section 1504.3
and 1504.3.1, is it acceptable to use a "self-adhering" cap sheet that
does not have a "Structural Uplift Resistance Rating"



Section 1504.3 Wind resistance of nonballasted roofs. Roof coverings installed on roofs in accordance with Section 1507 that are mechanically attached or adhered to the roof deck shall be designed to resist the design wind load pressures for cladding in Chapter 16.

**1504.3.1 Other roof systems.** Roof systems with built-up modified bitumen, fully adhered or mechanically attached single-ply through fastened metal panel roof systems, and other types of membrane roof coverings shall also be tested in accordance with FM 4450, FM 4470, UL 580, or UL 1897.

The CAP SHEET is now a Hybrid product - serving as the ADHESIVE and the Approved Cap Sheet (physical properties).

Without a FORMAL TEST and "STRUCTURAL UPLIFT RATING" how do you determine if the roof system is capable of withstanding the design pressures?

The Department of Community Affairs issued a clarification to the Florida Building Commission (attached) instructing the necessity "Verification of Compliance with the Limitations of Use".

Respectfully Submitted,

Timothy Graboski

Tim Graboski Roofing Inc

23rd of November 2010