

From: Mike Silvers [mailto:Silvers@floridarroof.com]
Sent: Monday, January 23, 2023 3:32 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Cc: John Hellein <John@floridarroof.com>
Subject: Public Comment on FBC 8th Edition 2023 SUPPLEMENTS - POST COMMISSION - December 13, 2022

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Mo,
Please accept the following as FRSA’s four Public Comments on the Supplements:

Modification (R10180 AS)/(R9909 AS)
ROOFING APPLICATION STANDARD (RAS) No. 115 STANDARD PROCEDURES FOR ASPHALT SHINGLE INSTALLATION

4.2 ~~All~~ Underlayments shall be fastened with approved minimum 12 gage by 1¹/₄ in. corrosion-resistant annular ring shank roofing nails fastened through minimum 32 gage by 1⁵/₈ in. diameter approved diameter tin caps. Underlayment shall be attached to a nailable deck in a grid pattern of 12 inches (305mm) between overlaps, with 6-inch (152 mm) spacing at overlaps at the overlaps. Nails shall be of sufficient length to penetrate through the sheathing or wood plank a minimum of ³/₁₆ in. or penetrate 1 inch (25 mm) or greater thickness of lumber a minimum of 1 in., except where architectural appearance is to be preserved, in which case a minimum of ³/₄ in. nail may be used.

Rational: The underscored U in underlayment was capitalized because the intent was to strike the word “All” at the beginning of the sentence. The strikethrough of “All” was inadvertently removed when originally submitted. The “All” should be deleted. After the commission’s previous actions on related modifications, it is no longer applicable.

Modification (R9915 AS)
ROOFING APPLICATION STANDARD (RAS) No. 118-20 INSTALLATION OF MECHANICALLY FASTENED ROOF TILE SYSTEMS Direct Deck & Counter Battens Only

TABLE 1

Roof Pitch	Counter Battens or Direct Deck	Choice of Underlayment	Plastic or Compatible Roof Cement at Nails Penetrating Underlayment	Reference
4:12 or Greater	Either	1. ASTM D226 Type II (#30) or ASTM D2626 (#43) organic base sheet nailed to deck, min. (#90)	Required	3.01A

		ASTM D6380, Class M or WS, Type II organic cap sheet set in Type IV hot asphalt.		
	Either	2. Any Product Approval Approved underlayment system with a mechanically fastened base sheet, and cap sheet set in hot, cold, or self-adhered	Per Product Approval	3.01B, C, or D
	Either	3. Product Approval Listed Approved nail-on single-ply underlayment	Per Product Approval	3.01E

Modification (R9916 AS)

ROOFING APPLICATION STANDARD (RAS) No. 119-20 INSTALLATION OF MECHANICALLY FASTENED ROOF TILE SYSTEMS Direct Deck & Horizontal Battens Only (Preformed Metals With Edge Returns)

TABLE 1

Roof Pitch	Counter Battens or Direct Deck	Choice of Underlayment	Plastic or Compatible Roof Cement at Nails Penetrating Underlayment	Reference
4:12 or Greater	Either	ASTM D226 Type II (#30) or ASTM D2626 (#43) organic base sheet nailed to deck, min. (#90) ASTM D6380, Class M or WS, Type II organic cap sheet set in Type IV hot asphalt.	Required	3.01A
	Either	2. Any Product Approval Approved underlayment system with a mechanically fastened base sheet, and cap sheet set in hot, cold, or self-adhered	Per Product Approval	3.01B, C, or D
	Either	3. Product Approval Listed Approved nail-on single-ply underlayment	Per Product Approval	3.01E

Modification (R9917 AS)

ROOFING APPLICATION STANDARD (RAS) No. 120-20 MORTAR AND ADHESIVE SET TILE APPLICATION

TABLE 1

Roof Pitch	Choice of Underlayment	Plastic or Compatible Roof Cement at Nails Penetrating Underlayment	Reference
2:12 or Greater	ASTM D226 Type II (#30) or ASTM D2626 (#43) inorganic base nailed to deck, min ASTM D6380, Class M or WS, Type II (#90) organic cap sheet set in Type IV hot asphalt.	Required	3.01 A
	2. Any product approved underlayment system with a mechanically fastened base sheet, and cap sheet set hot, cold, or self-adhered.	per Product Approval	3.01 B, C, D or E

Rationale for the proposed changes in the 3 previous Tables:

After the commission’s previous actions on related modifications, the inclusion of “nail-on” or “system with a mechanically fastened base sheet, and cap sheet set hot, cold, or self-adhered” is no longer applicable. See “E” in the “Reference” column in the three Tables and shown as it currently appears in the code below.

3.01 Underlayment Applications—CHOOSE ONE of the following:

E. Self-Adhered Underlayment (Single Ply). A single-ply underlayment system utilizing any Product approved self-adhered underlayment. The roof cover is terminated at approved metal flashings. Apply one layer of any self-adhered underlayment in compliance with the underlayment manufacturers approved/requirements.

If you have any questions or formatting issues, please contact me.

Thanks,

Mike Silvers, CPRC

Director of Technical Services
FRSA, PO Box 4850, Winter Park, FL 32793
3855 N. Econlockhatchee Trail, Orlando, FL 32817
407-671-3772 ext. 169
www.floridarooft.com
“FRSA-Florida’s Association of Roofing Professionals”

