Gulf Coast Supply & Manufacturing, LLC.

4020 SW 449th St., Horseshoe Beach, FL. 32648

888-393-0335

FILED

Department of Business and Professional Regulation Deputy Agency Clerk

CLERK Date

Brandon Nichols

File#

January 8, 2014

PETITION FOR DECLARATORY STATEMENT BEFORE THE FLORIDA BUILDING COMMISSION

Petitioner:

Gulf Coast Supply and Manufacturing, LLC 4020 SW 449th St Horseshoe Beach, FL 32648

Contact:

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DS 2014-002

Statute(s), Agency Rule(s), Agency Order(s) and/or Code Section(s) on which the Declaratory Statement is sought: 2010 Florida Building Code Chapter 15, sections 1503.1, 1503.2.1 & 1507.4, and Tables 1503.2 & 1507.4.3(1).

Background:

Gulf Coast Supply and Manufacturing, LLC is a leading manufacturer of metal roofing systems in Florida, with over 30 different product approvals including the one we have a question on, FPA # 11651.25. We have four manufacturing locations in Florida, and sell directly to hundreds of state certified roofers from Key West to Jacksonville to the Gulf Coast and west to Panama City. We supply hundreds of roofing packages per week, primarily for residential applications, but for some Commercial and Agricultural applications as well. The roofing packages contain metal roofing panels (which are tested as part of the approval), and flashings (which are not tested as part of the approval).

We have a question about the requirements of Chapter 15 of the Florida Building Code. The code requires that the minimum thickness of <u>metal roofing panels</u> be in accordance with table 1507.4.3(1), which requires Aluminum Zinc Coated Steel panels to be at least .013" thick. However, there is nothing in section 1507.4 that specifies minimum thicknesses for <u>flashings that are used on metal roofs</u>. There is, however, a table in the beginning of Chapter 15 that addresses the subject (Table 1503.2), and according to that table the minimum thickness for Aluminum Zinc Coated Steel Flashings is .0179".

Questions(s)

Question #1: Does Table 1503.2 set forth the minimum thickness requirements flashings used on metal roof systems, even though thinner metal roofing panels are acceptable per Table 1507.4.3(1)?

Question #2: Do what we in the industry call "Trims" (eave drips, wall trims, ridge caps, preformed valleys, etc) qualify as flashings, seeing they are always installed at the locations listed in 1503.2.1.

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Summary:

Gulf Coast Supply believes that the answer to Question #1 is "YES" because most of our approvals only have a UL580 test, which tests panel attachment for uplift, but does not test flashings. Also, because Table 1503.2 is not listed under a particular roofing type, we interpret it to be a general requirement for all roofing types.

We also believe the answer to Question #2 is "YES", because a simple name change doesn't change the purpose of the "Trim" as "Flashing". The only exception listed in 1503.2.1 is for Ridge/Hip intersection pieces, and not for the ridge and hip caps themselves.

Please feel free to email or call me should you have any questions.

Respectfully,

Gulf Coast Supply and Manufacturing, LLC

Ray Bowen

VP Sales & Marketing