

Issue: To review the product approval rule provisions regarding product approval issues pertaining to the use of portable roll form machines.

Background:

Code requirements:

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 components and cladding in accordance with Section 1609.

2010 Florida Building Code, Building

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 4474, UL 580 or UL 1897.

1504.3.2 Metal panel roof systems.

Metal panel roof systems through fastened or standing seam shall be tested in accordance with UL 580 or ASTM E 1592 or TAS 125.

Exception: Metal roofs constructed of cold-formed steel, where the roof deck acts as the roof covering and provides both weather protection and support for structural loads, shall be permitted to be designed and tested in accordance with the applicable referenced structural design standard in Section 2209.1.

Rule 61G 20-3 State Product Approval Systems:

Under the Statewide Product Approval System, a roof system with metal panels that are manufactured in the factory is required to be approved using one of the uniform product approval methods (test report, certification agency or evaluation report). Using the test report method, a manufacturer is required to submit a test report from an approved test lab, a validation by an approved validation entity and select an approved quality assurance program. Using the certification agency method, a manufacturer is required to submit a certification which provides for the name and address of the certification agency, the manufacturer's product model number, the standard(s) the product was tested to, and the performance level of the product; have validation by an approved validation entity, and select an approved quality assurance program. Using the evaluation method, a manufacturer is required to submit an evaluation report from an approved evaluation entity, have validation by an approved validation entity, and select an approved quality assurance program.

Rule 61G20-3 Product Approval

61G20-3.005 Product Evaluation and Quality Assurance for State Approval.

(3) Products listed in Rule 61G20-3.001, F.A.C., shall be manufactured under a quality assurance program audited by an approved quality assurance entity.

61G20-3.007 Product Approval by the Commission.

(1) Approval of a product or system of construction for state acceptance shall be performed by the Commission through the following steps:

(a) A product manufacturer or owner of a proprietary system or method of construction, or its designee (applicant) shall apply to the Commission for approval by filing an application in accordance with subsection 61G20-3.011(2), F.A.C., validated in accordance with Rule 61G20-3.006, F.A.C., and submitting fees pursuant to subsection 61G20-3.007(2), F.A.C. Application shall be made through the Building Codes Information System on the Internet, www.floridabuilding.org, and payment shall be by credit card or electronic check.

(b) The applicant submits all documentation required and fees in accordance with Rule 61G20-3.005 and subsection 61G20-3.007(2), F.A.C., respectively.

(c) With exception to product applications submitted pursuant to paragraph 61G20-3.005(1)(a), F.A.C., upon Commission acceptance of the required documentation pursuant to Rule 61G20-3.005, F.A.C., and validation of compliance with the Code pursuant to Rule 61G20-3.006, F.A.C., the Commission may approve the product for use statewide in accordance with its approval and limitations of use unless credible evidence is provided questioning the validity of the documentation submitted in support of the application for approval.

Notes:

- Rule 61G20-3.007, FAC, specifically allows application for Commission approval of a product to be submitted by a “product manufacturer or owner of a proprietary system of method of construction, or its designee..”
- The state product approval is not specific to any particular location of manufacturing activities, but are focused on the characteristics of the product for which approval is sought.
- The state product approval is contingent upon the technical documentation submitted with the application for approval that indicates compliance with the Florida Building Code and the product is manufactured subject to a quality assurance program that is audited by a third-party quality assurance entity approved by the Commission for that purpose.

Comment Received:

Comment #1:

Hello Mo,

Thanks for the opportunity to describe how many Florida metal roof manufacturers are getting around the intent of the Florida Product Approval system.

The issue begins with the good intentions of roll forming equipment manufacturers wanting to obtain credential for the products their equipment produces. To be clear, these equipment

manufacturers do not manufacture metal roof products, but produce & sell the equipment and raw materials (steel coil) used by metal roof manufacturers.

The equipment manufacturers engineer & test the roof products their equipment produces, then properly obtain Florida Product Approval to demonstrate these products meet code. However, after obtaining FPAs, *these equipment manufacturers neither grant or deny the use of these approvals by their metal roof manufacturing customers.*

The metal roof manufacturers then employ their equipment supplier's FPA's without authorization and without the requisite quality assurance. It is no secret in Florida that 99% of the time when a valid FPA is presented, building officials will not ask if the manufacturer is authorized to employ that Approval.

Keystone has received many complaints on this subject over the years from our Quality Assurance Program participants who properly comply with FPA requirements. These honest manufacturers feel cheated and disadvantaged by the FPA fees & costs they pay, but their less-honest competitors do not.

I am eager to answer any questions you may have, and volunteer to present to the POC / Commission on this subject if there is interest.

Jon Hill
President
Keystone Certifications, Inc.

Comment #2:

Dear Sir,

I received a copy of the attached correspondence from Dwight Wilkes after having discussions with him during our Keystone inspection about a problem I am having.

I sincerely hope Mr. Jon Hill and yourself take no offence with Mr. Wilkes providing me with the correspondence between you two.

If you look Sunlast Metal Inc. up you will find that we have tested and paid for a number of Florida Approvals, and Miami-Dade NOA's. we strive diligently to do all necessary quality assurance checks, maintain accurate records, and manufacture to the highest standards Metal Roofing Products made with US origin steel and aluminum.

My problem reflects the "real world" fact of life for a Metal Roofing Manufacturer in the State of Florida. In the last year one of my customers, Total Roofing Inc. decided to create a manufacturing company named Extreme Metal Inc. Since they had done installation work for some of my other customers over the past few years (recommended by me at Total's request) they went to these customers and threatened to not install any longer for them unless they buy their metal roofing from Extreme Metal Inc.. They joined the Englert Association and started manufacturing with no experience, quality control, or standards. I have caught them using my FL. approvals on numerous occasions, and I am prosecuting them in a civil action (This will be the second roofing company I have caught doing this). Recently they moved into the same

industrial complex that I am in and are located 300ft. from my front door. While my company is doing fine I estimate that they have stolen almost 1 million dollars in sales from me. Yet they continue to operate not being held to any quality standards, recordkeeping requirements, or revealing the source or quality of their metal forming coil.

In conclusion, I am surprised that no state agency has stepped in, to rein in these rogue manufacturers of metal roofing products, and protect the product integrity and safety of the Florida homeowners who feel they are buying the finest and safest roofing product for their home and family.

Please feel free to contact me if you have any questions.

Sincerely,

Terry Kapron
President



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Staff analysis: It is the responsibility of the manufacturer to make sure that the metal roofing panels are manufactured in accordance with the specifications and limitations of use of the State Product Approval and manufactured under a quality assurance program that is audited by a third-party quality assurance entity approved by the Florida Building Commission for that purpose.