



**Florida Building Codes**  
USER: Joe Bigelow, akhanjumbojet, Product Manufacturer

[Binding Interpretations Menu](#) > [Petition Search](#) > [Petition List](#) > [Petition Detail](#) > **Petition Comment Detail**

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<b>Petition #</b>	186
<b>Submitted By</b>	Frank Voss
<b>Date Submitted</b>	06/23/2020
<b>Comment</b>	I am in agreement with the petitioner. There is no basis for denial based on what the code states. The new nailing will secure both layers of shingles so even that does not provide grounds for rejection.
<b>Submitted By</b>	John Farinelli
<b>Date Submitted</b>	06/25/2020
<b>Comment</b>	Assuming the building in question is a single family residential structure built prior to the adoption of the FBC, the petitioner fails to address the provisions of FBC, Existing Building Section 706.7, Mitigation. Section 706.7.1 requires the roof deck fastening to be examined and supplemental nails added if the existing fastening does not meet the provisions of Table 706.7.1.2. The issue of recover versus replacement is moot if the roof deck/sheathing requires re-nailing. Further, the petitioner incorrectly references FBC-R 706.3 and FBC, EB 708.3, both of which do not exist in the 6th Edition of the code..
<b>Submitted By</b>	Michael Silvers (FRSA)
<b>Date Submitted</b>	06/29/2020
<b>Comment</b>	FRSA supports the opinion of the petitioner and is opposed to the interpretation of the building department. Existing elements (roof deck) built in compliance with the building code at the time of construction (and not being altered) shall be considered in compliance with the provision of this (current) code (Existing Building {EB} 301.1, 302.3 and others). Section EB 706.7 Mitigation requires certain improvements to the roof decking under very narrow parameters that currently are limited to single-family residential structures built prior to the implementation of the Florida Building Code (FBC). It states: "When the roof covering on an existing sitebuilt single-family residential structure is removed" then the "roof decking attachment" must

be addressed. This is mandated by state statutes (F.S. 553.844). By recovering an existing roof this requirement does not apply because the existing roof covering is not removed. It seems to be accepted that EB 706.3 1. through 4. do not apply to this work. The building department is interpreting 5. "Where the existing roof is to be used for attachment for a new roof system and compliance with the securement provisions of Section 1504.1 of the Florida Building Code, Building cannot be met", then "New roof coverings shall not be installed without first removing all existing layers of roof coverings down to the roof deck." (CONTINUED ON SEPARATE COMMENT)

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Submitted By	Michael Silvers (FRSA)
Date Submitted	06/29/2020
Comment	(CONTINUED) The intent of 5. (an FRSA Modification) was to clarify that the load path for the roof covering, when recovering, had to meet the current code. If the intention was to include the roof deck it would have said: Where the existing roof assembly is to be used for attachment. The reference to 1504.1 in this case would be for roof coverings and, since no alteration is being done to the "roof deck", it would not apply. If this interpretation is allowed to stand, it would mean that EB 706.7 would be bypassed, leaving the exception for structures built in compliance with the FBC inapplicable. That would mean that during all reroofs (replacement and recovering) the deck would have to meet the current wind loads in Chapter 16 (soon to be ASCE 7-16). In that case, virtually all roof decks built to previous standards would require upgrades to at least their attachments. The intent of the code and statute does not support this interpretation.

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Submitted By	Ben Bailey
Date Submitted	06/29/2020
Comment	I would side with the petitioner as the Building Department has not cited a code section for denial that would be relevant. If none of the conditions set forth in Existing Code Section 706.3 are present, the existing roof should be allowed to be recovered. If one of those conditions exist then the existing roof covering would need to be removed. Once removed, Section 706.7 would then trigger the requirements for re-nailing and securement.



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