## **BCAB**

Building Code Advisory Board of Palm Beach County

January 19, 2011

Department of Community Affairs Building Codes and Standards 2555 Shumard Oak Boulevard Tallahassee, Florida 32399-2100

Attn: Mr. Rick Dixon, Executive Director

Florida Building Commission

Re: Uplift Resistance and Limitations of Use - Self-Adhering Underlayment in

Adhesive or Mortar Applied Tile Roofing Systems

Dear Mr. Dixon,

This letter is written on behalf of the Palm Beach County Building Code Advisory Board. The Board was established by a Special Act of the Florida Legislature in 1974, and amended in 2001. Among other duties, it is authorized to advise local governments regarding the evaluation of new and innovative materials, products, systems, or methods of construction for code compliance.

The purpose of this letter is to urge the establishment of appropriate testing and limitations of use for the uplift values of self-adhering underlayments, especially important when used in adhesive and mortar set concrete or clay tile roofing systems. The code is very clear as to the required performance for the tiles themselves to resist uplift in accordance with Section 1609.5.3, but the ability of the self-adhered underlayment has no clear requirements for testing and performance designated. As such, product approvals have been issued for these components, that have the potential to be the weak link in the uplift resistance of an adhesive or mortar set tile roofing system.

We have seen anecdotal examples that attest to this potential. Until product approvals allowing the use of self-adhered underlayments were issued, certain Board members who are also Building Officials, refused to allow such installations due to this lack of performance data.

Rule 9N-3.007 and Florida Statute 553.842 provide that statewide approval shall preclude local jurisdictions from requiring further testing, evaluation, or submission of other evidence as a condition of using the product so long as the product is being used consistent with the conditions of its approval, including limitations of use and the appropriateness for the specific installation. Although a building official may appeal the required approval for local use of a product or method or system of construction to the commission, we would prefer to communicate our concerns and ask that the commission takes steps to address them. Please let us know if you have any questions regarding this position.

Yours Truly,

Howarth L. Lewis Jr. FAIA, Chair

Palm Beach County Building Code Advisory Board

C: Raul Rodriguez, AIA

Chair, Florida Building Commission

Ed Carson

Chair, Product Approval Oversight Committee

Charlie Danger, P.E.

Director, Miami Dade Building Code Compliance Office