



Informal Interpretation Report Number 6991



Date June 13, 2012

Edition 2010

Section 612.1

Question:

Is it the intent of Florida Building Code (Energy Conservation) Section 502--Table 502.1.1.1 (2) that if an existing building is reroofed that the insulation R-Value must be upgraded to an R-Value of at least 38? I was under the impression that the existing R-Value must not be decreased and not necessarily increased

Answer

No, unless the reroof cost equals or exceeds 30% of the assessed value of the structure or if the reroof is part of a broader scope of work which results in a cumulative cost equaling or exceeding the 30% assessed value threshold. However, existing levels of R-Value may not be reduced.

Commentary:

Reroofing is regulated as an Alteration Level 1 by the FBC, Existing Building Code. Section 601.2 indicates that the current level of energy efficiency may not be reduced, and section 612.1 directs one to the FBC, EC for energy conservation compliance.

Section 101.4.1 of the FBC, EC provides direction to Table 101.4.1 for existing buildings. This Table indicates that building envelope renovations must comply with sections 402 or 502, subject to footnote “d”. This footnote

makes clear that the reroof is exempt from further compliance with the FBC, EC if the 30% assessed value threshold is not equaled or exceeded.

The roof insulation requirement of R-38 is applicable to new construction, additions and reroofs which exceed or are part of work the cumulative value of which equals or exceeds the 30% threshold, and then only if pursuing the prescriptive compliance path.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.