



**Informal Interpretation Report
Number 7351**



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Edition 2010

Section Table 104.4.1

Question:

Is it the intent of Table 104.4.1 to allow a reroofing project to proceed without additional insulation being added to being it into compliance with Table 502.1.1.1(2)

Answer

Yes

Commentary:

If the work does not exceed 30% of the assessed value of the structure, or the work is not part of overall renovations exceeding 30% of the assessed value of the structure, compliance to current code is not required.

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, Energy Conservation 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, Energy Conservation if the 30% assessed value threshold is not equaled or exceeded. However, current levels of insulation may not be reduced.

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.