



**Informal Interpretation Report
Number 8216**



Date February 21, 2019

Edition 2017

Section 1510.10

Question:

Is it the intent of the Florida Building Code: Existing Building, regarding a commercial re-roof project and when rooftop mounted HVAC equipment does not need to be removed, that curb heights be corrected to meet the requirements of FBC: Building, Section 1510.10? Under this condition, does the Code compel a building owner to remove the existing roof top units to correct the curbs to comply with the provisions in the Code?

Answer

Specifically, FBC-B, section 102.8 states:

"Existing mechanical equipment.

An agency or local government may not require that existing mechanical equipment located on or above the surface of a roof be installed in compliance with the requirements of the Florida Building Code except during reroofing when the equipment is being replaced or moved and is not in compliance with the provisions of the Florida Building Code relating to roof-mounted mechanical units."

So, if not being replaced or moved for roofing they would not have to comply with 1510.10

Commentary:

For clarification, the question states in this case the roof top unit does not need to be removed. The bigger question is what if I only have to pick it up 3" +/- to re-flash, and set it back down in the exact spot? Does that qualify as "moved", moved to a different location, or physically moved at all? It is believed the original intent of the wording was to correct the situation if the unit was moved, meaning slid, lifted, twisted or otherwise moved for the purpose of reroofing.

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.