

## GG300-14

### 605.2, 1003.2.7

**Proponent:** Jason Wilen, National Roofing Contractors Association, representing National Roofing Contractors Association (NRCA) (jwilen@nrca.net)

**Revise as follows:**

**605.2. Roof replacement.** Above-deck insulation for roof replacement on an existing building with insulation entirely above the deck and where the roof slope is less than two units vertical in 12 units horizontal (17-percent slope) shall be in accordance with Section 1003.2.7.

**1003.2.7 Roof replacement insulation.** For roof replacement on an existing building with insulation entirely above the deck and where the roof slope is less than two units vertical in 12 units horizontal (16-percent slope), the insulation shall conform to the energy conservation requirements for insulation entirely above deck in the *International Energy Conservation Code*.

**Exception:** Where the required R-value cannot be provided due to thickness limitations presented by existing rooftop conditions, including heating, ventilating and air-conditioning equipment, low door or glazing heights, parapet heights, proper roof flashing heights, the maximum thickness of insulation compatible with the available space and existing uses shall be installed.

**Reason:** The existing code text for section 1003.2.7 was approved as a public comment for proposal GG722-11 at the 2011 IgCC Final Action Hearings. In the reason statement for the approved public comment cited a peer reviewed document: *The Energy and Environmental Potential of Commercial Buildings: Implications for Energy Policy and Industry Growth through Green Building Market Transformation* by Phalan, J., Hoff, J., and Pavolvich, G (2010). In the report, it states only low-slope roofing was included in the market analysis. The report also acknowledges production figures compiled from the Polyisocyanurate Insulation Manufacturers Association (PIMA) were used to determine the extent of the commercial roof replacement market and for impact assessment calculations. The report makes clear the existing text in section 1003.2.7 primarily benefits the polyisocyanurate insulation industry. The report is included with this proposal as a reference.

The purpose of this code change is to ensure replacement roof systems comply with IECC roof insulation minimums in all cases and configurations. The proposed change preserves the exception so flexibility can be exercised by the code official when appropriate.

**Cost Impact:** Will increase the cost of construction.

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