

STATE BUILDING CODE INTERPRETATION NO. I-5-02

February 7, 2002

The following is offered in response to your January 31, 2002 FAX transmission to me requesting a formal interpretation of section 3404.2 of the BOCA National Building Code/1996 portion of the 1999 State Building Code.

Question: A rehabilitation project at an existing building includes replacing the built-up roofing membrane and replacing a portion of the roof drain that interfaces with the membrane without replacing any of the roof drainage piping. Does the 1999 State Building Code require the addition of a secondary roof drainage system?

Answer: No, assuming that no secondary roof drainage was required at the time of permit application for the original construction. Section 3404.2 of the BOCA National Building Code/1996 portion of the 1999 State Building Code states in part that “portions of the structure not altered and not affected by the alteration are not required to comply with the code requirements for a new structure. The replacement of the existing roof membrane and the refurbishment of the primary roof drain do not affect the requirement for secondary roof drainage in that neither of these activities increases the need for drainage. Confusion may occur from the language of section 1512.1 of the referenced code which states in part that “more than 25 percent of the roof covering of any building shall not be removed and replaced within any 12-month period unless the entire **roof covering** is made to conform to the requirements for new roofing. (emphasis added)” I call attention to the words roof covering emphasized above to clarify that the requirement for code conformance is limited to the roof covering and not to the entire roof system. Thus, it is clear that it is not the intent of the code to require roof drainage that is in compliance with the current code to be installed simply because the roof covering membrane has been replaced.