

## ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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**1323, CE-13**

*PIMA Proposal #2 (To be considered with PIMA Proposals #1 and #3)*

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### **Proposed Code Change - Language**

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

Add the following new language after **section C402.2.1.1 (2012 IECC)**:

**C402.2.1.2 Insulation Requirements for Roof Replacement.** 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, the insulation shall conform to the energy conservation requirements as specified in Table C402.2.

**Exception:** Where the required R-value cannot be provided due to thickness limitations presented by existing rooftop conditions, including heating, ventilation 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.

### **Proposed Code Change – Need and Reason**

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

The prescriptive envelope requirements for roof replacements in the base code are inadequate in that they do not appropriately address the technical concerns that often arise during roof replacement projects. The base code does not exempt roof replacements from full compliance with the envelope R-Value requirements in Table C402.2. This proposal (along with PIMA proposals #1 and #3) adds clarity by providing guidance on the specific technical issues that impact the amount of additional roof insulation included in roof replacement projects. PIMA proposal #3 (related to this proposal) also adds a definition of roof replacement that includes the word “alteration,” a change that ties such projects to the existing building provisions found in other portions of the Minnesota codes. The proposed modification under PIMA Proposal #1 related to exception 5 under C101.4.3 is dependent on this proposed change and clarifies that for steep slope roofs and roofs where the insulation is not located above the roof deck, it is not necessary to increase the insulation when re-roofing.

### **Proposed Code Change – Cost/Benefit Analysis**

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

This proposal (along with PIMA proposals # 1 and #3) is a clarification intended to specify the requirements for roof replacement projects. The stringency of the code would not be affected, but it would become easier to follow and enforce. For some projects, the option of installing reduced levels of insulation will reduce project cost.

### **Other Factors to Consider Related to Proposed Code Change**

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

Adds a new section C402.2.1.2.

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.

No.

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.

Yes. The definition of roof replacement should be coordinated with the definitions found in the IBC.

5. Who are the parties affected or segments of industry affected by this proposed code change?

Roofing contractors, architects, building owners, and product manufacturers.

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

No.

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.

EPACT requires states to seek appropriate energy efficiency code provisions.