BBS MEMO

Ohio Board of Building Standards April 4, 2017 6606 Tussing Road, P.O. Box 4009, Reynoldsburg, Ohio 43068-9009

Approvals and Inspections for Re-Roofing Projects of 1-,2- & 3- Family Dwellings

The Board of Building Standards regularly receives calls from homeowners and insurance companies regarding the code requirements for reroofing projects and the process that must be followed to receive approval from the certified building department having jurisdiction. The 2013 Residential Code of Ohio (RCO) § 101.2 states that "no building or its equipment or accessories, to which the rules of the board apply shall be erected, constructed, or installed, except in conformity with the rules of the Board." Unless provided for under RCO § 113.6 or § 113.9, all roofing projects on 1-, 2- & 3-family dwellings in the State of Ohio shall be in compliance with the RCO.

By definition, reroofing, is "the process of recovering or replacing an existing roof covering." A roof covering is "the covering applied to the roof deck for weather resistance, fire classification or appearance." If the reroofing project is either a replacement or repair to existing, approved systems, materials or building components (RCO § 113.6) or part of an historic building (RCO § 113.9), the work may not be required to meet all of the provisions for new construction. In all other cases, the new roof covering is new construction and shall comply with the requirements of the RCO Chapter 9 and specifically for repair/replacement/recover RCO § 907.

The Residential Code of Ohio § 105.1 requires that any owner "...who intends to construct, enlarge, alter, repair, move, or change the occupancy of a residential building or structure ... shall first make application to the residential building official of a certified residential building department and obtain the required approval." Plan approval is required for all reroofing projects unless considered a minor repair. The Residential Code of Ohio § 108.1 states that "After residential construction documents have been approved, construction or work may proceed in accordance with the approved documents." The Residential Code of Ohio § 108.2 continues that "At the time that the certificate of plan approval is issued, the residential building official shall provide to the owner, or the owner's representative, a list of all required inspections for each project." The Residential Code of Ohio § 108 does not list (re)roofing as a required inspection. However, under RCO § 108.2.10, the residential building official may require additional inspections of any residential construction work, including reroofing, to ascertain compliance with the RCO.

If inspections are required and because roof work is sensitive to weather exposure, essential elements of an inspection process are communication, coordination, action and timeliness. In addition to verifying that the materials used are approved and the installation has followed manufacturer's instructions, a building department may choose to establish an inspection process for (re)roofing projects to verify that critical structural and weather resistant work is in compliance with approved construction documents. Typical areas for, and consequentially timing of, inspection(s) may include but are not limited to:

- Substrate including framing, sheathing, venting, insulation, saddles, and crickets. Recovering conditions, water damage, missing material and poor anchorage can all contribute to early failure of a roofing project. Some non-compliant conditions may be signs of poor or non-

existent maintenance of an approved installation. This opportunity is lost after underlayment is installed.

- Underlayment including venting, building paper, ice barrier, drainage and sealants. Proper overlap, attachment and, in some cases, separation are necessary for performance of material as a temporary protection during construction and a secondary protection of the permanent system.
- Flashing/Transition including drip edge, step flashing, valley flashing, drainage and hidden termination conditions. Proper overlap and attachment are necessary for performance of material in the completed roof system. Not all of these elements can be verified after the project is complete.
- Covering including main weather protection, seams, edge attachment, copings and transition of materials. Proper coverage, overlap, attachment, and sealing contribute to the roof systems performance as a weather resistant barrier. Material used, damage to or a missing covering are about the only conditions that can be verified at the conclusion of work on a roofing project.
- Accessories including gutters, scuppers, satellite dishes, antennas, weather vanes, chimneys, flues, vents, skylights, tanks, cupolas and lightning protection. All represent potential structural or weather resistant impacts to a roofing system. Addition of these elements or others may require more inspections.

If non-compliant construction is identified, the inspector must follow requirements outlined in RCO § 108.6. A permanent record shall be made of inspections required, the inspection reports made and owner's response when work was found to be non-compliant with approved construction documents.

If the building official determines the work is in violation of the board's rules, or the building is in unsafe condition or is a serious hazard, the building official must proceed in accordance with RCO § 109. Only the building official may issue orders.

All projects that require plan approval must receive a certificate of occupancy (or completion)[i] upon completion of all the work done in accordance to the approved construction documents.

If you have further questions regarding reroofing projects on 1, 2, & 3 Family Dwellings, please call the Board's office at 614-644-2613 or E-mail to BBS@com.state.oh.us.

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[i] Draft amendments to the Ohio Building Code includes new section 111.1.2 to permit issuance of certificate of completion for alterations or repairs:

> **Certificate of completion for alterations and repairs**. The certificate of completion shall indicate the conditions under which the building shall be used. The building owner shall only use the structure in accordance with the certificate of completion and any stated conditions. The structure and all approved building service equipment shall be maintained in accordance with the approval.
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> When the work in a building or structure is entitled thereto, the building official shall issue a certificate of completion for the work provided there are not violations of the rules of the board or orders of the building official pending or as permitted in this section. Occupancy of spaces within a building which are unaffected by the work shall be allowed to continue if the building official determines the existing spaces can be occupied safely.

This will be included in the Residential Code of Ohio, Chapter 1 in a future rule package.