

**LEGISLATIVE REVIEW**  
**MAY 21, 2013 – REPORT #12**

**BBS ISSUES MEMOS FROM RCAC RECOMMENDATIONS**

As a result of recent discussions by the Residential Construction Advisory Committee (RCAC), the Board of Building Standards has issued three new BBS Memos offering clarification on three areas of the RCO. The memos can be found on the BBS website, and have also been attached.

One of the memos addresses fireplace door requirements. While the RCAC is in the process of discussing potential changes to RCO language, the recent memo points out the safety consequences and possible conflict created with the 2009 model code language for installation of gasketed doors or tight-fitting dampers.

A second memo sent out by the BBS deals with the scope of application of the energy code in roof replacement. The energy conservation standards contain roof system alteration language, the intent of which may be confusing and somewhat difficult to understand. The RCAC discussed need for further interpretation after concerns were raised that sometimes, depending upon the type of existing roof system and the scope of the proposed roof work, it may be difficult to define “to the extent of the alteration” or difficult to determine how the proposed alteration may affect the existing building in terms of energy usage. The example below, along with the attached memo, is intended to aid in clarifying the requirement under the RCO.

**Example:** Given: An existing single- family dwelling having a cathedral ceiling/roof assembly (gypsum board ceiling directly attached to wood frame structural supporting members, plywood sheathing roof deck, and asphalt roof shingles).

**Proposed:** Removal and replacement of the shingles, underlayment, and any rotted sheathing.

**Required:** Although a literal reading of the code would require the thermal envelope to meet code because the sheathing is exposed and cavities are exposed, the Board intends for this to be more liberally applied for residential buildings. If there was no existing insulation in the ceiling/roof cavity, a literal reading of Section 101.4.3 of IECC (Exception 5) would require adding insulation either above or below the sheathing to meet current code prescriptive “R” values because the roof is part of the thermal envelope assembly. However, the Board’s intent is to limit the requirement to add insulation to only those cavities where the sheathing was removed and replaced. No additional insulation would be required above the sheathing. If there was existing insulation in the ceiling/roof cavity, then Section 101.4.3 of IECC (Exception 3) would allow the existing insulation levels to suffice.

The BBS issued its final memo, entitled RCO Section 315, to satisfy the RCAC recommendation to provide clarification on intent of section requiring installation of CO alarms. In the current edition of the RCO the smoke alarm language was corrected by limiting its impact on other parts of a dwelling in which no work was being done. Unfortunately, there is language in RCO Section 315.2 which may require installation of a CO alarm whenever work requiring a “permit” is performed. This was not the intent. Until corrections are made to RCO Section 315.2 as was made to the smoke alarm

language, several steps can be taken to correctly implement this section. These steps are further detailed in the attached BBS memo.

Please refer to attached BBS Memos for details on each of the above outlined issues and feel free to contact OHBA with any questions/concerns.