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Correction Needed: Exception to Section 141.0(b)2Biii

The cited Section lists several exceptions to the minimum insulation requirements for roof alterations that are set forth in Table 141.0-C. Three (3) exceptions (a, b and c) are listed, but there should actually be four (4) exceptions (a, b, c and d)

Situations where the existing roof already has R-7 insulation are covered under exception a.

Exception b. provides an exception if adding the insulation required by Table 141.0-C would reduce base flashing heights around mechanical equipment below 8 inches.

The problem is with Exception c. This exception allows variance from the requirements of Table 141.0-C, "provided that the conditions in Subsections i through iv apply." Subsections i through iv then go on to describe the various conditions that must be met to avail oneself of exception c. This is all well and good. The problem is with the inexplicable appearance of an unrelated Subsection v.

Subsection v is very different from the other Subsections of Exception c. It has nothing whatsoever to do with base flashing heights, roof/wall ratios or any other condition that might necessitate non-compliance with minimum insulation requirements.

To the contrary, Subsection v contemplates a situation where the requirements of Table 141.0-C are going to be complied with, but on an average thermal resistance basis. In order to create slope-to-drain, contractors are permitted to install more than the required amount of insulation at high points of the roof and less insulation at drains and other low points, so long as the average thermal resistance of the roof as a whole meets or exceeds the value specified in table 141.0-C.

Subsection v has nothing to do with the other provisions of Exception c. It deals with an entirely different situation. Accordingly, it should be renumbered as Exception d to Section 141.0(b)2Biii.

Thank you for your attention and consideration.

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