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### POLICY FOR ROOF INSTALLATIONS

Numerous questions come into this office as to whether we enforce all of chapter 9, Roof Assemblies, in the 2021 International Residential Code (IRC). The simple answer is yes.

We have adopted the 2021 version of the IRC along with local amendments. However, there are no amendments to chapter 9 of this code other than we do not require an ice barrier per section 905.1.2. Therefore, we do enforce all of the requirements in this chapter along with the remainder of the code. Specifically, we are asked if we enforce the installation of a drip edge per section R905.2.8.5 and valley linings per section R905.2.8.2 and low slope per section R905.2.2. The answer is yes. All of chapter 9 of the 2015 IRC is required and enforced in this jurisdiction.

We also get numerous questions as to when the manufacturer's installation instructions take precedence over code provisions based on section R903.1. In a nutshell, all roof installations must meet the provisions of the code and the manufacturer's installation instructions. The provisions of the code are the minimum basic requirements for a safe building for the occupants. There is nothing that says a designer can't do more than the code requires as long as they meet the intent of the code.

The manufacturer's installation instructions do not trump the provisions of the code but are required to be followed per section R905.1. They are installation requirements that the manufacturer requires for their particular product. Therefore, all roof installations must meet both sets of requirements.

That being said, we will not be moderators between the insurance companies and roofing contractors. We will not approve a noncompliant installation nor will we require unnecessary expense to the owner/insurance carriers. An existing roof is just that – existing and likely noncompliant with today's code. There must be some commonsense used in determining the point where an existing roof deck must be replaced/covered and when a repair must turn into a complete reroof with possible sheathing improvements. Following are some examples of issues we've encountered:

An existing roof needs to be repaired but the contractor says new shingles won't match the existing (size wise).

- This is totally between the contractor and the home owner. A permit is not required for a residential roof repair unless decking is damaged. Therefore, we will not be the arbitrator between the contractor, the owner and the insurance company.

A reroof has been torn off and the existing decking has excessive gaps between the sheathing members.

- We will allow an average of 1/4" gaps on existing roofing before requiring the deck to be overlaid. If the gaps exceed an average of 1/4", some means of repair must happen by either filling the gaps or overlay 3/8" wood structural panel sheathing per Table R503.2.1.1(1). Additionally, overlaying existing decking with 3/8" or thicker sheathing adds substantial weight to the existing rafters and will require a letter from a structural engineer approving the new load on the existing structure. New sheathing or repair to sheathing does require a permit.

A repair using new asphalt shingles on an existing roof will void the warranty of the shingles in accordance with the shingle manufacturer.

- This is strictly between the homeowner and the contractor. We are talking about a roof that has been there for years most likely. If it is leaking, the decision to replace the entire roof and maintain a manufacturer's warranty or repair the leak and lose the warranty will be the homeowner's decision.

On the following pages are some commonly asked questions regarding roof installations in Shelby County.

**Do you enforce all of the IRC for roofing and reroofing in Shelby County?**

Yes, we enforce the IRC in its entirety. The issue is that permits are not required for reroofing a single-family home unless there is deck work. Therefore, we may never see the work that was done.

**What edition of the IRC do you enforce?**

The 2021 edition of the International Residential Code

**Does Shelby County require an ice and water shield (barrier)?**

No, per our local amendment

**Does Shelby County require a drip edge?**

Yes, per chapter 9 of the 2021 IRC.

**Is a permit required for a reroof job on a single family home?**

No, a permit is not required unless the decking is to be repaired or altered.

**Do you require additional solid sheathed decking on an existing roof for a reroof with no other deck issues?**

As long as the gaps in the existing decking do not exceed an average of 1/4", we do not require that the existing decking be altered. Should the gaps exceed 1/4", per manufacturer's installation instructions, the deck must be overlaid with 3/8" plywood or equivalent.

**Do you call insurance companies on behalf of owners or contractors to explain requirements for roofing?**

Absolutely not. We enforce the code and will work with the owner somewhat on time needed to complete required work. However, whether something is covered by the homeowner's insurance carrier or not is completely outside of our jurisdiction.

**What if my roofing contractor tells me my decking needs to be topped with plywood to meet code but my insurance company does not want to cover the costs?**

That is an issue between you and your insurance carrier. When issues such as large gaps in the existing decking are brought to our attention, we will require the deck repaired by either filling the gaps or overlaid to make it a solidly sheathed deck. We will cite the owner only.

**Can I use new shingles to repair my existing roof?**

Yes, although the manufacturer of the shingles may have changed the size of the shingles somewhat. The roofing contractor should be able to repair the roof adequately. This does not require a permit and is between the homeowner and the contractor.

**If my roof is old and I get a leak due to storm damage repaired, is there anything in the code that says I must replace the entire roof?**

No, as long as the roof is still protecting the home from the elements, replace your existing roof is up to you.

**Is underlayment required for my new roof installation?**

Yes, per Table 905.1.1(2) of the IRC.

**Are there any sections or Chapter 9 of the IRC that you do not enforce?**

The only part of chapter 9 that we amended was the requirement for an ice and water shield. Other than that, we enforce the entire chapter.

**My insurance carrier says they will not pay to put new plywood decking over the existing decking because Construction Enforcement does not enforce that part of the code. Is this correct?**

No, we do enforce all sections of the IRC other than the ice and water shield. However, we may not know the existing deck needs replacing or topping because we do not require permits for a reroof unless decking is part of it. If brought to our attention, we will cite the owner of the property to correct code violations. We do not get involved in who pays.

**Is a Tennessee Licensed Contactor required for roofing in Shelby County?**

Yes, when a project is over \$3,000, depending on monetary limit, either a Home Improvement Contractor or a Building Contractor licenses is required

**How many layers of roof can I have on my house before I am required to remove existing layers?**

This depends entirely on-site specific circumstances and the materials used. For additional direction, please see IRC 2021 Section 1512.2.1

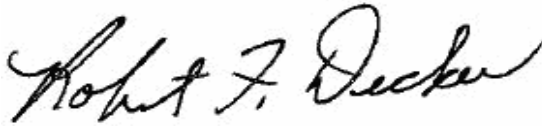
**What is the difference between a repair, recovering and replacement?**

The code defines each of these terms in the following way:

**Roof Repair:** Reconstruction or renewal of any part of an existing roof for the purposes of correcting damage or restoring pre-damage condition.

**Roof Recovering:** The process of installing an additional roof covering over a prepared existing roof covering without removing the existing roof covering

**Roof Replacement:** The process of removing the existing roof covering, repairing any damaged substrate and installing a new roof covering.

A handwritten signature in black ink, reading "Robert F. Decker". The signature is written in a cursive style with a large initial 'R' and 'D'.

Building Official