



## MANUFACTURED HOUSING CONSENSUS COMMITTEE

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# MINUTES GENERAL SUBCOMMITTEE MEETING

May 5, 2015

Teleconference

(Approved at the July 24<sup>th</sup>, 2019 General Subcommittee teleconference)

# MINUTES MANUFACTURED HOUSING CONSENSUS COMMITTEE (MHCC) GENERAL SUBCOMMITTEE MEETING

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## Call to Order

MHCC General Subcommittee Chairman, Mark Mazz, called the meeting to order at 1:07 p.m. (Eastern). Kevin Kauffman called the roll and announced that a quorum was present and that all user groups were represented. See Appendix A for a list of meeting attendees.

## Opening Remarks

Pamela Beck Danner, Administrator of the Office of Manufactured Housing Programs and the Designated Federal Officer (DFO) for the Manufactured Housing Consensus Committee (MHCC), welcomed the General Subcommittee members and guests, and announced that this is a meeting of the MHCC General Subcommittee and that the meeting notice and tentative agenda was published in the Wednesday, April 8, 2015 *Federal Register* (Vol. 80, No. 67).

DFO Danner informed the participants of the general procedure to allow comments first from the General Subcommittee members, second from MHCC members, followed by public comment.

## Approval of the February 11, 2015 Minutes

### **Motion to approve the minutes of the February 11, 2015 MHCC General Subcommittee Meeting.**

Motion: David Tompos                      Second: Mike Lubliner

Motion passed unanimously.

## Dwelling Unit Definition Task Force Report

On the February 11, 2015 MHCC General Subcommittee teleconference, a task force was assigned to recommend definitions for dwelling unit and how those definitions will be incorporated in the standard. The task force, chaired by David Tompos, included Steve Anderson, Gregg Scott, Dominic Frisina, Rick Hanger, and Chris Flannery.

David Tompos provided an overview of the Task Force's assignment to define a manufactured home that includes provisions for multi-unit dwellings and changes to the standard. Mr. Tompos stated that the main issue with multi-unit dwellings is fire separation and that the task force reviewed all aspects of the standard to include "per dwelling unit."

Mr. Tompos noted that following the vote to submit language to the General Subcommittee, there were two additional submittals (Steve Anderson, water meters; and Bert Kessler, sound transmission and draftstopping in floors) that the General Subcommittee should consider and decide if these two submittals should be included in the proposed change language. Since this meeting is setup as a

GoToMeeting, Kevin Kauffman confirmed that all participants could “see” working document being discussed/modified (see Appendix B). Mr. Kauffman noted that all changes made during and subsequent to the task force conference call were in blue.

A question was raised as to whether or not to address draftstopping at this time. Rick Mendlen noted that the MHCC had previously recommended provisions for draftstopping and that those provisions will be part of a future ruling. Mark Mazz asked Mr. Mendlen for a comparison of the recommended provisions and Bert Kessler’s submittal. Mr. Mendlen agreed to provide the recommended provisions.

It was ultimately agreed to not include the draftstopping language in the proposed submittal with the caveat that this issue be noted in the minutes (see Appendix B) to ensure that provisions on draftstopping make their way into the standards.

The General Subcommittee went on to discuss/modify the language of the working document submitted by the task force.

**Motion to have Mr. Kauffman submit on behalf of the General Subcommittee a proposed change using the modified language generated during the teleconference (see Appendix B).**

Motion: Dominic Frisina                      Second: Mike Lubliner

Motion passed unanimously.

## Open Discussion

Kevin Kauffman noted that the meeting notice was sent to:

1. MHCC members to inform them that the meeting will take place, and
2. General Subcommittee members with detailed call-in information.

**Motion to Adjourn.**

Motion: Steve Anderson                      Second: Dave Tompos

Motion passed unanimously and the meeting was adjourned at 3:00 p.m.

# APPENDIX A: ATTENDEES

General Subcommittee Meeting – May 5, 2015 – Teleconference

## Subcommittee Members Present

1. Mark Mazz (Subcommittee Chair)
2. Steven Anderson
3. Michael Lubliner
4. Leo Poggione
5. Dominic Frisina
6. Greg Scott
7. Rick Hanger
8. David Tompos

## Other MHCC Members Present

1. Lois Starky

## HUD Supported Staff Present

1. Pamela Danner (DFO)
2. Leo Hewitt
3. James Martin
4. Patricia McDuffie
5. Richard Mendlen
6. Teresa Payne
7. Demetress Stringfield

## Contract Staff

1. Kevin Kauffman – AO
2. Tanya Akers – AO
3. Jason McLJury – IBTS

## Other Attendees

1. Mark Weiss – MHARR

# Appendix B:

## Dwelling Unit Definition Task Force Working Document

### National Manufactured Housing Construction and Safety Standards Act of 1974

Sec 603(6) “manufactured home” means a structure, transportable in one or more sections, which in the traveling mode is eight body feet or more in width or forty body feet or more in length, or, when erected on site, is three hundred twenty or more square feet, and which is built on a permanent chassis and designed **to be used as a dwelling** with or without a permanent foundation...

#### 3280.2 Definitions.

*Manufactured home* means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed **to be used as a dwelling** with or without a permanent foundation ...

*Dwelling* means any structure that contains one to a maximum of [three](#) dwelling units, designed to be occupied for residential living purposes.

...

*Dwelling unit* means a single unit providing complete independent living facilities for one or more persons, [where the occupancy is primarily permanent in nature](#), including permanent provisions ~~one or more habitable rooms which are designed to be occupied by one family with facilities for~~ [separate](#) living, sleeping, cooking, [sanitation](#), and eating...

#### 3280.211 Multi-Unit Dwellings.

(a) In structures with more than one dwelling unit, each dwelling unit shall be separated from each other by wall and floor assemblies having not less than a 1-hour fire-resistance rating when tested in accordance with ASTM E119-14 or UL263-2014 or not less than a 1-hour fire-resistance when calculated in accordance with Chapter 16 of National Design Specification for Wood Construction - 2015. Fire-resistance-rated floor/ceiling and wall assemblies shall extend to and be tight against the exterior wall, and wall assemblies shall extend from the foundation to the underside of the roof sheathing.

#### Exceptions:

- (1) Wall assemblies need not extend through attic spaces where the ceiling is protected by not less than 5/8 -inch Type X gypsum board, and attic draft stop constructed as specified in Section 3280.212 is provided above and along the wall assembly separating the dwellings and the structural framing supporting the ceiling is protected by not less than ½-inch gypsum board or equivalent.

(b) Supporting Construction. Where floor assemblies are required to be fire-resistance rated by Section 3280.211, the supporting construction of such assemblies shall have an equal or greater fire-resistance rating.

(c) Dwelling unit rated penetrations. Penetrations of wall or floor-ceiling assemblies in multi-unit dwellings shall be required to be fire-resistance rated in accordance with this section.

#### (1) Through penetrations.

- (i) Penetrations shall be installed as tested in the approved fire-resistance-rated assembly; or

(ii) Penetrations shall be protected by an approved penetration firestop system installed as tested in accordance with ASTM E814-13 or UL 1479-2014, with a positive pressure differential of not less than 0.01 inch of water and shall have an F rating of not less than the required fire-resistance rating of the wall or floor-ceiling assembly penetrated; or

(iii) Where the penetrating items are steel, ferrous or copper pipes, tubes or conduits, the annular space shall be protected as follows:

(1) In concrete or masonry wall or floor assemblies, concrete, grout or mortar shall be permitted where installed to the full thickness of the wall or floor assembly or the thickness required to maintain the fire-resistance rating, provided that both of the following are complied with:

(a) The nominal diameter of the penetrating item is not more than 6 inches.

(b) The area of the opening through the wall does not exceed 144 square inches.

(1) The material used to fill the annular space shall prevent the passage of flame and hot gases sufficient to ignite cotton waste where subjected to ASTM E119-14 or UL 263-2014 time temperature fire conditions under a positive pressure differential of not less than 0.01 inch of water at the location of the penetration for the time period equivalent to the penetration for the time period equivalent to the fire-resistance rating of the construction penetrated.

(2) Membrane penetrations. Membrane penetrations shall comply with 3280.211(c)(1). Where walls are required to have a fire-resistance ~~rated rating~~, recessed fixtures shall be installed so that the required fire-resistance rating will not be reduced.

Exceptions:

(i) Membrane penetrations of ~~not more than 2-hour~~ fire-resistance-rated walls, ceiling/floors and partitions by steel electrical boxes ~~that provided they~~ do not exceed 16 square inches in area ~~provided that~~ ~~and~~ the aggregate area of the openings through the membrane does not exceed 100 square inches in any 100 square feet of wall area. The annular space between the wall membrane and the box shall not exceed 1/8 inch. Such boxes on opposite sides of the wall shall be separated by one of the following:

(1) By a horizontal distance of not less than 24 inches where the wall or partition is constructed with individual noncommunicating stud cavities.

(2) By a horizontal distance of not less than the depth of the wall cavity where the wall cavity is filled with cellulose loose-fill, rockwool or slag mineral wool insulation.

(3) By solid fireblocking in accordance with Section 3280.206

(4) By protecting both boxes with listed putty pads.

(5) By other listed materials and methods.

(ii) Membrane penetrations by listed electrical boxes of any materials provided that the boxes have been tested for use in fire-resistance-rated assemblies and are installed in accordance with the instructions included in the listing. The annular space between the wall membrane and the box shall not exceed 1/8 inch unless listed otherwise. Such boxes on opposite sides of the wall shall be separated by one of the following:

(1) By the horizontal distance specified in the listing of the electrical boxes.

(2) By solid fireblocking in accordance with Section 3280.206

(3) By protecting both boxes with listed putty pads.

(4) By other listed materials and methods.

(iii) The annular space created by the penetration of a fire sprinkler provided that it is covered by a metal escutcheon plate.

### **3280.212 Draftstopping**

~~-(a) In manufactured homes where there is usable space both above and below the concealed space of a floor-ceiling assembly, draftstops shall be installed so that the area of the concealed space does not exceed 1,000 square feet. draftstopping shall divide the concealed space into approximately equal areas. Where the assembly is enclosed by a floor membrane above and a ceiling membrane below, draftstopping shall be provided in floor-ceiling assemblies under the following circumstances:~~

~~(1) Ceiling is suspended under the floor framing;~~

~~(2) Floor framing is constructed of truss-type open-web or perforated members.~~

~~(b) Materials. Draftstopping materials shall be not less than ½-inch gypsum board or ¾-inch wood structural panels. Draftstopping shall be installed parallel to the floor framing members. The integrity of the draftstops shall be maintained.~~

### **3280.5 Data plate**

Each ~~manufactured homes~~ dwelling unit shall bear a data plate affixed in a permanent manner near the main electrical panel or other readily accessible and visible location. ...

**3280.103(b) Whole-house ventilation.** Each ~~manufactured home~~ dwelling unit must be provided with whole-house ventilation having a minimum...

**3280.105(a) Number and location of exterior doors.** ~~Manufactured homes~~ Each dwelling unit shall have a minimum of two exterior doors located remote from each other.

**3280.109(a)** ~~Every manufactured homes~~ Each dwelling unit shall have at least one living area with not less than 150 sq. ft. of gross floor area.

### **3280.309 Health Notice on formaldehyde emissions.**

(a) Each ~~manufactured home~~ dwelling unit shall have a Health Notice on formaldehyde emissions prominently displayed in a temporary manner in the kitchen...

### **3280.510 Heat loss certificate**

The manufactured home manufacturer shall permanently affix the following "Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant homeowner. ...

### **3280.511 Comfort cooling certificate and information.**

(a) The manufactured home manufacturer shall permanently affix a "Comfort Cooling Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant homeowner. ...

**3280.609(a)(2) Hot water supply.** Each ~~manufactured home~~ dwelling unit equipped with a kitchen sink, and bathtub and/or shower shall be provided with a hot water supply system including a listed water heater.

**3280.705(j) Gas supply connections.** When gas appliances are installed, at least one gas supply connection shall be provided on each ~~home~~ dwelling unit. ...

### **3280.802 Definitions.**

...

(20) Feeder assembly means the overhead or under-chassis feeder conductors, including the grounding conductor, together with the necessary fittings and equipment, or a power supply cord approved for manufactured home use, designed for the purpose of delivering energy from the source of electrical supply to the distribution panelboard within the manufactured home each dwelling unit.

### 3280.803 Power supply

(a) The power supply to the manufactured home shall be a feeder assembly consisting of not more than one listed 50 ampere manufactured home power-supply cords, or a permanently installed circuit. A manufactured home that is factory-equipped with gas or oil-fired central heating equipment and cooking appliances shall be permitted to be provided with a listed manufactured home power supply cord rated 40 amperes. **This section does not apply to multi-unit dwellings**

### 3280.804 Disconnecting means and branch-circuit protective equipment.

...

(c) *Disconnecting means*. A single disconnecting means must be provided in each manufactured home dwelling unit, consisting of a circuit breaker, or a switch and fuses and its accessories, installed in a readily accessible location near the point of entrance of the supply cord or conductors into the manufactured home dwelling unit.

...

(g) Branch-circuit distribution equipment shall be installed in each manufactured home dwelling unit and shall include overcurrent protection for each branch circuit consisting of either circuit breakers or fuses.

...

**(h) A service distribution panel shall be factory installed and connected to the subpanels on multi-unit dwellings.**

...

### 3280.805 Branch circuits required.

(a) The number of branch circuits required shall be determined in accordance with the following:

- (1) Lighting, based on 3 volt-amperes per square foot times outside dimensions of ~~the manufactured home~~ each dwelling unit (coupler excluded) divided by 120 volts times amperes to determine number of 15 or 20 ampere lighting area circuits. ...

Add to 3285:

~~**3285.603.XXX Water Connections and Meters.** This section is applicable to multiple-family-unit manufactured homes consisting of two or more dwelling units served through a separate meter or battery of meters. Each dwelling unit shall have a separate water connection for each meter and each dwelling unit shall be metered separately.~~

~~3285.603(c) (1) An identified and accessible shut off valve must be installed for each dwelling unit between the water supply and the inlet.~~

### 3280.114 Sound Transmission between Multi-unit dwellings

#### (a) Scope.

This section shall apply to common interior walls, partitions and floor/ceiling assemblies between adjacent *dwelling units*. ~~or between *dwelling units* and adjacent public areas such as halls, corridors, stairs or service areas.~~

#### (b) Air-borne sound.

Walls, partitions and floor/ceiling assemblies between stories separating *dwelling units* from each other ~~or from~~



public or service areas shall have a sound transmission class (STC) of not less than 3945 (45 if field tested) for air-borne noise when tested in accordance with ASTM E 90 or calculated. Penetrations or openings in construction assemblies for piping; electrical devices; recessed cabinets; bathtubs; soffits; or heating, ventilating or exhaust ducts shall be sealed, lined, insulated or otherwise treated to maintain the required ratings. This requirement shall not apply to *dwelling unit* entrance doors; however, such doors shall be tight fitting to the frame and sill.

#### ~~1207.2.1 Masonry.~~

~~The sound transmission class of concrete masonry and clay masonry assemblies shall be calculated in accordance with TMS 0302 or determined through testing in accordance with ASTM E 90.~~

#### **(c) Structure-borne sound.**

Floor/ceiling assemblies between stories separating *dwelling units* or between a *dwelling unit* and a public or service area within the structure shall have an impact insulation class (IIC) rating of not less than 3945 (45 if field tested) when tested in accordance with ASTM E 492.

#### ~~718.3 Draftstopping in floors.~~

~~In combustible construction, draftstopping shall be installed to subdivide floor/ceiling assemblies in the locations prescribed in Sections 718.3.2 through 718.3.3.~~

##### ~~718.3.1 Draftstopping materials.~~

~~Draftstopping materials shall not be less than  $\frac{1}{2}$ -inch (12.7 mm) gypsum board,  $\frac{3}{8}$ -inch (9.5 mm) wood structural panel,  $\frac{3}{8}$ -inch (9.5 mm) particleboard, 1-inch (25-mm) nominal lumber, cement fiberboard, batts or blankets of *mineral wool* or glass fiber, or other *approved* materials adequately supported. The integrity of *draftstops* shall be maintained.~~

##### ~~718.3.2 Groups R-1, R-2, R-3 and R-4.~~

~~Draftstopping shall be provided in floor/ceiling spaces in Group R-1 buildings, in Group R-2 buildings with three or more *dwelling units*, in Group R-3 buildings with two *dwelling units* and in Group R-4 buildings. Draftstopping shall be located above and in line with the *dwelling unit* and *sleeping unit* separations.~~

#### **Exceptions:**

~~1. Draftstopping is not required in buildings equipped throughout with an *automatic sprinkler system* in accordance with Section 903.3.1.1.~~

~~2. Draftstopping is not required in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.2, provided that automatic sprinklers are also installed in the combustible concealed spaces where the draftstopping is being omitted.~~

##### ~~718.3.3 Other groups.~~

~~In other groups, draftstopping shall be installed so that horizontal floor areas do not exceed 1,000 square feet (93 m<sup>2</sup>).~~

~~**Exception:** Draftstopping is not required in buildings equipped throughout with an *automatic sprinkler system* in accordance with Section 903.3.1.1.~~

#### ~~718.4 Draftstopping in attics.~~

~~In combustible construction, draftstopping shall be installed to subdivide *attic* spaces and concealed roof spaces in the locations prescribed in Sections 718.4.2 and 718.4.3. Ventilation of concealed roof spaces shall be maintained in accordance with Section 1203.2.~~

##### ~~718.4.1 Draftstopping materials.~~

~~Materials utilized for draftstopping of *attic* spaces shall comply with Section 718.3.1.~~

##### ~~718.4.1.1 Openings.~~

~~Openings in the partitions shall be protected by *self-closing* doors with automatic latches constructed as required for the partitions.~~

#### **~~718.4.2 Groups R-1 and R-2.~~**

~~Draftstopping shall be provided in attics, mansards, overhangs or other concealed roof spaces of Group R-2 buildings with three or more dwelling units and in all Group R-1 buildings. Draftstopping shall be installed above, and in line with, sleeping unit and dwelling unit separation walls that do not extend to the underside of the roof sheathing above.~~

#### **Exceptions:**

- ~~1. Where corridor walls provide a sleeping unit or dwelling unit separation, draftstopping shall only be required above one of the corridor walls.~~
- ~~2. Draftstopping is not required in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.~~
- ~~3. In occupancies in Group R-2 that do not exceed four stories above grade plane, the attic space shall be subdivided by draftstops into areas not exceeding 3,000 square feet (279 m<sup>2</sup>) or above every two dwelling units, whichever is smaller.~~
- ~~4. Draftstopping is not required in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.2, provided that automatic sprinklers are also installed in the combustible concealed space where the draftstopping is being omitted.~~

#### **~~718.4.3 Other groups.~~**

~~Draftstopping shall be installed in attics and concealed roof spaces, such that any horizontal area does not exceed 3,000 square feet (279 m<sup>2</sup>).~~

**Exception:** ~~Draftstopping is not required in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.~~