

BOARD OF BUILDING REGULATIONS AND STANDARDS
Manufactured Buildings Study Group
Draft Meeting Minutes
March 12, 2019, @1 p.m.
Springfield Tech Community College
1 Armory Square in Springfield, MA 01105
Building 2, Room 703-704

A meeting of the “Manufactured Buildings Study Group” took place on March 13, 2019, at Springfield Tech Community College, 1 Armory Square in Springfield, MA 01105 Building 2, Room 703-704. In attendance were Robert Anderson (Chief of Inspections – Building & Engineering), Cheryl Lavalley (BBRS) Chief Kevin Gallagher (BBRS), Dan Walsh, Charles Kilb, Cesar Lastra, and Dave Sullivan.

Robert Anderson opened the meeting by taking roll call.

1. Chief Gallagher offered a motion to accept the February 15, 2019 meeting minutes. Cheryl Lavalley seconded. Unanimous vote.

2. Chief Gallagher spoke about the void space created when manufactured boxes are stacked. The upper box placed on top of the lower box creates a void space. Chief Gallagher said adding to this issue is the use of adhesives used in modular construction are exposed in void spaces and the adhesives transfer heat in fire situations and the industry does not have a handle on this. Chief Gallagher asked if the group has interest with reducing the 1000 square foot draft stopping area? Cheryl Lavalley understands the void space is unique to manufacture buildings. Chief Gallagher indicated section R302.1.2 requires draft stopping to be installed so that void space above a ceiling and below a floor does not exceed 1000 square feet but the code does not address the space from a cubic foot perspective. Chief Gallagher asked Mike Fitzpatrick for his perspective on the void space between a 1st-floor ceiling and the 2nd floor. Mike Fitzpatrick thinks the group needs to decide what areas of the structure should be protected and thinks the bedroom and stairs are two areas to consider protecting. Inspector Gordon Bailey spoke about the base code requires an attic area to be fire stopped every 3000 square feet and requires draft stopping over tenant separation walls. Inspector Gordon Bailey suggests 720 square feet is the largest modular box. He thinks the bigger issue is where to locate in the code a different draft stop requirement and maybe consider adding a new IRC section in chapter 3. Inspector David Holmes suggested a maximum horizontal distance should be considered. Mike Fitzpatrick thinks the kitchen space is a bigger exposure than other spaces in the structure. He indicated the boxes have 4” space between the ceiling joists and the floor next above. Mike Fitzpatrick suggests filling the cavity with fiberglass insulation will reduce the void space. Inspector Gordon Bailey pointed out that fiberglass insulation is not suitable for draft stop material. Catherine Christina said the boxes are 52’ long and the space between floors 24” in height and focus should be about that space and not the kitchen. The study group consensus is to not add draft stopping requirements for manufactured buildings by adding a new code section. Robert Anderson suggested staff can identify and offer a different draft stopping area. Lisa Davey suggested referencing fire stopping requirements in the nonresidential code provisions. She also asked if draft stopping requirements should be added to the R3 provisions? Rob Anderson

pointed out R3 does not typically include technical code provisions. The discussion ended with staff directed to identify a different draft stopping area requirement.

3. Dan Walsh distributed a photo of the label used to credential product manufactured under 110.R3. Dan Walsh explained the three documents in today's meeting packet that will be used to discuss agenda item 3. The 1st has the 8th edition 110.R3.10 Compliance Assurance Program requirements and the 2nd has the 9th edition 110.R3.3.2 Quality Assurance Manual requirements. A side by side comparison of these two documents shows that the requirements for manufacturers are essentially the same. The 3rd document titled Working Draft 1-B has all the 8th and the 9th editions 110.R3 language. The 9th edition language is in black font and the 8th edition language is in green font and black italic font. The black italic font is the 8th edition language the Study Group decided to carry forward during the February 15, 2019 meeting. Dan Walsh explained further that the Working Draft 1-B document ignores the 8th edition section numbers as the provisions were placed where each would best align with the 9th editions provisions so the differences can be compared. He offered that the section numbers would be correlated once the 8th edition language that the study group decides to bring forward has been decided.

Chief Gallagher explained to Lisa Davey and Richard Crowley the 9th edition 110.R3 language does not include all 8th edition provisions and significant text was left out without public vetting and some think the group should look at 8th edition language to bring forward. Chief Gallagher also suggested the 9th edition language might be scrapped and rewriting R3. Chief Gallagher asked for Rich Crowley's thoughts. Rich Crowley suggested the 9th edition building code changes might have happened when the agency lost staff but thinks the effort should focus on moving forward. Charles Kilb said every legal procedure was followed when the Board adopted the 9th edition. The group began discussing the 8th edition R3 language in the Working Draft 1-B document. The group consensus is not to carry the 8th edition Title after Charles Kilb pointed out the State Boards of Electricians, Plumbing and Gasfitters do not currently adopt rules and regulations governing manufactured buildings. The group agreed not to adopt the 8th edition Scope and Administration and Enforcement provisions. The group agreed to carry forward Authorization of Third-party Inspections, Approvals, and Compliance, Time of Manufacture (but strike: manufactured home), and the Retroactive Changes provisions. The group decided against bringing forward the Amendments provisions because it has other promulgating boards notifying the BBRS when their respective code provisions are updated, and this is currently not happening. Next, the group decided to keep the 8th edition Definitions provision, and the following definitions; Approval, Building System and Code. The group wants to come back to the Certification definition.

Time expired and the group suggested meeting April 2nd after the BBRS meeting at 1000 Washington St. Boston.

Robert Anderson motioned to adjourn and Cheryle Lavalley seconded. Unanimous.