



U. S. Department of Housing and Urban Development
Washington, D.C. 20410-8000

OFFICE OF THE ASSISTANT SECRETARY
FOR HOUSING-FEDERAL HOUSING COMMISSIONER

AUG 1 2000

Mr. David E. Seitz, CEO
Microtherm, Inc.
223 W. Airtex
Houston, TX 77090

Dear Mr. Seitz:

This is in response to your letter of February 26, 2000, regarding how the Federal Manufactured Housing Construction and Safety Standards (Standards) address the requirement of T&P valves and fire safety enclosures with tankless water heaters. I apologize for the lengthy delay. Your new and innovative product has raised several new issues which needed review.

You provided some informative material, questioning the necessity for a T&P valve with instantaneous, or tankless water heaters. Upon review, the Department agrees to approve the use of a listed tankless water heater in manufactured housing without a temperature and pressure (T&P) relief valve, where the absence of a T&P valve is contemplated by a standard endorsed by an appropriate listing organization. Your product, Seisco, appears to meet these requirements and, therefore, may be used.

Section 3280.604 (a) of the Federal Manufactured Home Construction and Safety Standards (Standards) states in part, "Where an appropriate standard is not indicated in the [following] table *or a standard not indicated in the table is preferred, the item may be used if it is listed.*" The Department is aware that Underwriters Laboratories, Inc., (UL) has evaluated and listed the Seisco instantaneous (tankless) water heater for residential hot water supply purposes, including manufactured homes, under UL Standard 499 and when used in accordance with the National Electrical Code (NEC). Further, the Department accepts the UL listing endorsing the NEC as an appropriate standard to apply to the installation of valves for temperature and pressure relief, as mandated by §3280.609(c).

With respect to the fire safety requirements applicable to the installation of the Seisco unit, please note that the requirements are as stated in the Standards, not as may be permitted under the listing or any other standard referenced by the listing. The special recognition accorded by §3280.604(a) to the listing for the water heater unit (and to the standard adopted by the listing for the T&P valve) does not extend to separate fire safety and installation requirements imposed by other sections of the Standards. Each DAPIA may accept the Seisco unit as an appropriate water heater and it does not have to require a separate T&P valve to be installed on the unit. The DAPIA must, however, also assure that the installation of the Seisco unit complies with other Standards applicable to water heaters before the DAPIA approves a manufacturer's home design.

Therefore, e.g., the water heater would have to be mounted in such a way that the walls and ceiling in the room or enclosure meet the flame spread requirements established in §3280.203(b)(3) of the Standards. Further, e.g., if the clearance space for the water heater is not framed in or guarded, an appropriate label would need to be affixed in accordance with §3280.709(c)(2)(iii).

I trust that this letter resolves the matters remaining on hand. Please feel free to call me at (202) 708-6409 if you have any further questions.

Sincerely,



Elizabeth A. Cocke
Director
Manufactured Home and
Standards Division

Enclosure

cc: Pamela Danner
HBT

Office of Asst. Sec. for Housing, HUD

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(iii) A receptacle outlet complying with § 3280.806(d)(10).

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§ 3280.604 Materials.

(a) *Minimum standards.* Materials, devices, fixtures, fittings, equipment, appliances, appurtenances and accessories shall conform to one of the standards in the following table and be free from defects. Where an appropriate standard is not indicated in the table or a standard not indicated in the table is preferred, the item may be used if it is listed. A listing is also required when so specified in other sections of this subpart.

(b) Where more than one standard is referenced for a particular material or component, compliance with only one of those standards is acceptable. Exceptions:

(1) When one of the reference standards requires evaluation of chemical, toxicity or odor properties which are not included in the other standard, then conformance to the applicable requirements of each standard shall be demonstrated;

(2) When a plastic material or component is not covered by the Standards in the following table, it must be certified as non-toxic in accordance with ANSI/NSF 61-2001, Drinking water system components—Health effects.

FERROUS PIPE AND FITTINGS

- Gray Iron Threaded Fittings—ANSI/ASME B16.4-1992.
- Malleable Iron Threaded Fittings—ANSI/ASME B16.3-1992.
- Material and Property Standard for Special Cast Iron Fittings—IAPMO PS 5-84.
- Welding and Seamless Wrought Steel Pipe—ANSI/ASME B36.10-1979.
- Standard Specification for Pipe, Steel, Black and Hot-Dipped, Zinc-Coated, Welded and Seamless—ASTM A53-93.
- Pipe Threads, General Purpose (Inch)—ANSI/ASME B1.20.1-1983.
- Standard Specification for Cast Iron Soil Pipe and Fittings—ASTM A74-92.
- Standard Specification for Hubless Cast Iron Soil Pipe and Fittings for Sanitary and Storm Drain, Waste, and Vent Piping Applications—CISPI-301-90.

NONFERROUS PIPE AND FITTINGS

- Standard Specification for Seamless Copper Pipe, Standard Sizes—ASTM B42-93.

- Standard Specification for General Requirements for Wrought Seamless Copper and Copper-Alloy Tube—ASTM B251-93.
- Standard Specification for Seamless Copper Water Tube—ASTM B88-93.
- Standard Specification for Copper Drainage Tube (DWV)—ASTM B306-92.
- Wrought Copper and Copper Alloy Solder-Joint Pressure Fitting—ASME/ANSI B16.22-1989.
- Wrought Copper and Wrought Copper Alloy Solder-Joint Drainage Fittings—DWV—ASME/ANSI B16.29-1986.
- Cast Copper Alloy Solder-Joint Pressure Fittings—ANSI B16.18-1984.
- Cast Copper Alloy Solder-Joint Drainage Fittings—DWV—ASME B16.23-1992.
- Cast Copper Alloy Fittings for Flared Copper Tubes—ASME/ANSI B16.26-1988.
- Standard Specification for Seamless Red Brass Pipe, Standard Sizes—ASTM B43-91.
- Cast Bronze Threaded Fittings, Classes 125 and 250—ANSI/ASME B16.15-1985.

PLASTIC PIPE AND FITTINGS

- Standard Specification Acrylonitrile-Butadiene-Styrene (ABS) Schedule 40 Plastic Drain, Waste, and Vent Pipe and Fittings—ASTM D2661-91.
- Standard Specification for Poly (Vinyl Chloride) (PVC) Plastic Drain, Waste, and Vent Pipe and Fittings—ASTM D2665-91b.
- Standard Specification for Drain, Waste, and Vent (DWV) Plastic Fittings Patterns—ASTM D3311-92.
- Standard Specification for Acrylonitrile-Butadiene-Styrene (ABS) Schedule 40, Plastic Drain, Waste, and Vent Pipe With a Cellular Core—ASTM F628-91.
- Standard Specification for Chlorinated Poly (Vinyl Chloride) (CPVC) Plastic Hot- and Cold-Water Distribution Systems—ASTM D2846-92.
- Standard Specification for Polybutylene (PB) Plastic Hot- and Cold-Water Distribution Systems—ASTM D3309-92a.
- Plastic Piping Components and Related Materials—ANSI/NSF 14-1990.

MISCELLANEOUS

- Standard Specification for Rubber Gaskets for Cast Iron Soil Pipe and Fittings—ASTM C564-88.
- Backflow Valves—ANSI A112.14.1-1975.
- Plumbing Fixture Setting Compound—TTP 1536A-1975.
- Material and Property Standard for Cast Brass and Tubing P-Traps—IAPMO PS 2-89.
- Relief Valves and Automatic Gas Shutoff Devices for Hot Water Supply Systems—ANSI Z21.22-1986, With Addendum Z21.22a-1990.
- Standard Specification for Solvent Cement for Acrylonitrile-Butadiene-Styrene (ABS) Plastic Pipe and Fittings—ASTM D2235-88.

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Standard Specification for Solvent Cements for Poly (Vinyl Chloride) (PVC) Plastic Piping Systems—ASTM D2564-91a.

Specification for Neoprene Rubber Gaskets for HUB and Spigot Cast Iron Soil Pipe and Fittings—CISPI-HSN-85.

Plumbing System Components for Manufactured Homes and Recreational Vehicles—ANSI/NSF 24-1988.

Material and Property Standard for Diversion Tees and Twin Waste Elbow—IAPMO PS 9-84.

Material and Property Standard for Flexible Metallic Water Connectors—IAPMO PS 14-89.

Material and Property Standard for Dishwasher Drain Airgaps—IAPMO PS 23-89.

Material and Property Standards for Backflow Prevention Assemblies—IAPMO PS 31-91.

Performance Requirements for Air Admittance Valves for Plumbing Drainage Systems, Fixture and Branch Devices—ASSE Standard #1051, 1990 Revised: 1996/ANSI 1998.

Drinking Water System Components-Health Effects—ANSI/NSF 61-2001.

PLUMBING FIXTURES

Plumbing Fixtures (General Specifications)—FS WW-P-541E/GEN-1980.

Vitreous China Plumbing Fixtures—ANSI/ASME A112.19.2(M)-1990.

Enameled Cast Iron Plumbing Fixtures—ANSI/ASME A112.19.1M-1987.

Porcelain Enameled Formed Steel Plumbing Fixtures—ANSI/ASME A112.19.4(M)-1984.

Plastic Bathtub Units with Addenda Z124.1a-1990 and Z124.16-1991—ANSI Z124.1-1987.

Standard for Porcelain Enameled Formed Steel Plumbing Fixtures—IAPMO TSC 22-85.

Plastic Shower Receptors and Shower Stalls with Addendum Z124.2a-1990—ANSI Z124.2-1987.

Stainless Steel Plumbing Fixtures (Designed for Residential Use)—ANSI/ASME A112.19.3M-1987.

Material and Property Standard for Drains for Prefabricated and Precast Showers—IAPMO PS 4-90.

Plastic Lavatories with Addendum Z124.3a-1990—ANSI Z124.3-1986.

Safety Performance Specifications and Methods of Test for Safety Glazing Materials Used in Building—ANSI Z97.1-1984.

Water Heater Relief Valve Drain Tubes—ASME A112.4.1-1993.

Flexible Water Connectors—ASME A112.18.6-1999.

Performance Requirements for Backflow Protection Devices and Systems in Plumbing Fixture Fittings—ASME A112.18.3M-1996.

Non-Vitreous Ceramic Plumbing Fixtures—ASME A112.19.9M-1991.

Dual Flush Devices for Water Closets—ASME A119.19.10-1994.

Deck Mounted Bath/Shower Transfer Valves with Integral Backflow Protection—ASME A112.18.7-1999.

Plastic Fittings for Connecting Water Closets to the Sanitary Drainage System—ASME A112.4.3-1999.

Hydraulic Performance Requirements for Water Closets and Urinals, ASME A112.19.6-1995.

Plumbing Fixture Fittings—ASME/ANSI A112.18.1M-1989.

Trim for Water Closet, Bowls, Tanks, and Urinals—ANSI A112.19.5-1979.

Plastic Water Closets, Bowls, and Tanks with Addenda Z124.4a-1990—ANSI Z124.4-1986.

ANSI Z124.5, Plastic Toilet (Water Closets) Seats, 1997.

ANSI Z124.7, Prefabricated Plastic Spa Shells, 1997.

Whirlpool Bathtub Appliances—ASME/ANSI A112.19.7M-1987.

ANSI Z-124.9, Plastic Urinal Fixtures, 1994.

Performance Requirements for Individual Thermostatic Pressure Balancing and Combination Control for Bathing Facilities—ASSE 1016-1988 (ANSI 1990).

Performance Requirements for Pressurized Flushing Devices (Flushometers) for Plumbing Fixtures—ASSE 1037-1990 (ANSI-1990).

Performance Requirements for Water Closet Flush Tank Fill Valves (Ballcocks)—ASSE 1002 Revision 5-1986 (ANSI/ASSE-1979).

Performance Requirements for Hand-held Showers—ASSE 1014-1989 (ANSI-1990).

Hydrants for Utility and Maintenance Use—ANSI/ASME A112.21.3M-1985.

Performance Requirements for Home Laundry Equipment—ASSE 1007-1986.

Performance Requirements for Hot Water Dispensers, Household Storage Type Electrical—ASSE 1023, (ANSI/ASSE-1979).

Plumbing Requirements for Residential Use (Household) Dishwashers—ASSE 1006, (ASSE/ANSI-1986).

Performance Requirements for Household Food Waste Disposer Units—ASSE 1008-1986.

Performance Requirements for Temperature Activated Mixing Valves for Primary Domestic Use—ASSE 1017-1986.

Water Hammer Arresters—ANSI A112.26.1-1969 (R 1975).

Suction Fittings for Use in Swimming Pools, Wading Pools, Spas, Hot Tubs, and Whirlpool Bathtub Appliances—ASME/ANSI A112.19.8M-1989.

Air Gaps in Plumbing Systems—ASME A112.1.2-1991.

Performance Requirements for Diverters for Plumbing Faucets with Hose Spray, Anti-Siphon Type, Residential Applications—ASSE 1025 (ANSI/ASSE-1978).

Performance Requirements for Pipe Applied Atmospheric Type Vacuum Breakers—ASSE 1001 (ASSE/ANSI-1990).

Performance Requirements for Hose Connection Vacuum Breakers—ASSE 1011-1981 (ANSI-1982).

Performance Requirements for Wall Hydrants, Frost Proof Automatic Draining, Anti-Backflow Types—ANSI/ASSE 1019-1978.

[58 FR 55013, Oct. 25, 1993, as amended at 70 FR 72048, Nov. 30, 2005]

EFFECTIVE DATE NOTE: At 78 FR 73985, Dec. 9, 2013, §3280.604(b)(2) was amended as follows, effective June 6, 2014.

a. In the list under the undesignated heading "Plastic Pipe and Fittings", add reference standards for "Standard Specification for Crosslinked Polyethylene (PEX) Tubing" and "Standard Specification for Crosslinked Polyethylene (PEX) Plastic Hot- and Cold-Water Distribution Systems," immediately before the undesignated heading "Miscellaneous";

b. In the list under the undesignated heading "Miscellaneous", revise the reference standard for "Standard Specification for Rubber Gaskets for Cast Iron Soil Pipe and Fittings" and "Relief Valves and Automatic Gas Shutoff Devices for Hot Water Supply Systems";

c. In the undesignated heading "Plumbing Fixtures", revise the reference standard for "Safety Performance Specifications and Methods of Test for Safety Glazing Materials Used in Buildings"; and

d. In the undesignated heading "Plumbing Fixtures", add a reference standard for "Performance Requirements for Automatic Compensating Values for Individual Shower and Tub/Shower Combinations" at the end of the list.

For the convenience of the user, the added and revised text is set forth as follows:

§ 3280.604 Materials.

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(b) * * *

(2) * * *

PLASTIC PIPE AND FITTINGS

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Standard Specification for Crosslinked Polyethylene (PEX) Tubing—ASTM F876-10 (incorporated by reference, see §3280.4).

Standard Specification for Crosslinked Polyethylene (PEX) Plastic Hot- and Cold-Water Distribution Systems—ASTM F877-07 (incorporated by reference, see §3280.4).

MISCELLANEOUS

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Standard Specification for Rubber Gaskets for Cast Iron Soil Pipe and Fittings, ASTM C564-97 (incorporated by reference, see §3280.4).

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Relief Valves for Hot Water Supply Systems, ANSI Z21.22-1999 (incorporated by reference, see §3280.4).

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Standard for Safety Glazing Materials used in Buildings—Safety Performance Specifications and Methods of Test, ANSI Z97.1-2004 (incorporated by reference, see §3280.4).

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PLUMBING FIXTURES

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Performance Requirements for Automatic Compensating Values for Individual Shower and Tub/Shower Combinations, approved January 2005 ASSE 1016-2005 (incorporated by reference, see §3280.4).

§ 3280.605 Joints and connections.

(a) *Tightness.* Joints and connections in the plumbing system shall be gas-tight and watertight for the pressures required under testing procedures.

(1) *Assembling of pipe.* All joints and connections shall be correctly assembled for tightness. Pipe threads shall be fully engaged with the threads of the fitting. Plastic pipe and copper tubing shall be inserted to the full depth of the solder cup or welding sockets of each fitting. Pipe threads and slip joints shall not be wrapped with string, paper, putty, or similar fillers.

(2) *Threaded joints.* Threads for screw pipe and fittings shall conform to the approved or listed standard. Pipe ends shall be reamed out to size of bore. All burrs, chips, cutting oil and foreign matter shall be removed. Pipe joint cement or thread lubricant shall be of approved type and applied to male threads only.

(3) *Solder joints.* Solder joints for tubing shall be made with approved or listed solder type fittings. Surfaces to be soldered shall be cleaned bright. The joints shall be properly fluxed with