



State of Michigan
John Engler, Governor

Department of Consumer & Industry Services
Kathleen M. Wilbur, Director

Bureau of Construction Codes
P.O. Box 30254
Lansing, Michigan 48909
Plan Review Division
(517) 241-9328

Approved
03/18/98

March 3, 1998

Document No. 98-45

TO: The Construction Code Commission
FROM: Irvin J. Poke, AIA, Chief, Plan Review Division
SUBJECT: Interpretation Request

Question: Can a premanufactured unit be approved when it does not comply with one or more parts of the State construction code? Specifically, can a unit be approved without plumbing, mechanical and electrical fixtures and equipment?

Answer: Yes.

Commentary: The Part 11 Premanufactured Rules state:

R 408.31106 (4) *"Premanufactured unit" means an assembly of materials or products intended to comprise all or part of a building or structure, and that is assembled, at other than the final location of the unit of the building or structure, by a repetitive process under circumstances intended to insure uniformity of quality and material content. The term includes a mobile home.*

It is clear that a premanufactured unit is not required to be a completed building. It may be approved as a component of a building and therefore, may not comply with all parts of the construction code. Section 19 of 1972 P.A.230 and the Part 11 Premanufactured Unit Rules are met as long as the approval is clear in its scope.

The Building System Approval Report (BSAR) clearly indicates which parts of the state construction code were applied and has an area to identify any limitations of the approval. These sections of the BSAR were developed in recognition that there may be a practical need to approve premanufactured units without total compliance with the State construction for a completed building.

There are many premanufactured buildings that are ordered without plumbing, mechanical, and electrical fixtures and equipment. Local authorities having jurisdiction, have the ability to permit the use of a building without total compliance with the state codes, based on temporary or limited use. The purchaser of the building may prefer to comply with local requirements, or variance. Examples of such uses are construction offices on project site, temporary training facilities where people are not schedule to meet in the building more than an hour at a time.

Therefore, a premanufactured unit may be approved for manufacture without meeting the requirements for a completed building. There are often practical and logistical reasons for not installing some features in the factory and others on the site. As long as the BSAR is clear about what is approved and the limitations of that approval, the purpose of the Premanufactured Units Program has been served. The Premanufactured Units Program is simply there to assure that what is built in the factory complies with the state code.

IJP/md

cc: File