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## **Bureau of Construction Codes**

### **Technical Bulletin**

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# Replacement Water Heaters

*“Providing for Michigan’s Safety in the Built Environment”*

Technical bulletins are issued to provide clarification on issues which arise regarding code administration and enforcement. The information provided in the bulletin is developed to promote uniform interpretation and enforcement of the state codes.

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## **REPLACEMENT WATER HEATERS**

### **Issue**

Recent revisions to the State Plumbing Law include amendments to the provisions of the law governing the installation of gas fired water heaters. Section 15(5) of the State Plumbing Law provides:

“This act does not prevent a person from performing any activities within the scope of licensure or registration under any other licensure or registration act or applicable codes for that licensed or registered professional adopted pursuant to law.”

Does this revision replace the requirements set forth in Technical Bulletin Number 5 on the replacement of gas fired water heaters? Further, is a mechanical contractor license required to replace a water heater?

### **Discussion**

Technical Bulletin Number 5 clarifies the requirements for the installations of gas fired water heaters and sets forth the licensing and installation standards by which such installations should be measured.

While the two licensing statutes set forth who may perform installation of replacement water heaters, some clarification is needed to address the duplicity of permits, who may perform the specific work associated with the replacement of water heaters and the standards by which the work should be measured.

As noted in Technical Bulletin Number 5, the Michigan Mechanical Code provides for the installation of boilers, water heaters, and pressure vessels. The regulations include provisions for safety and pressure relief valves and controls, gas piping, venting and materials for installation.

The Michigan Plumbing Code provides for the installation of water heaters. Specifically, Chapter 5 addresses the installation, connections, safety devices, and insulation requirements.

Additionally, the Michigan Residential Code sets forth similar provisions.

Because the licensing provisions have been addressed within the State Plumbing Law, coordination of these requirements with the mechanical licensing provisions must be reviewed.

The Forbes Mechanical Contractors Act, PA 192 of 1984, as amended, provides for the licensing of all persons performing the installation, alteration, and servicing of specified heating, cooling, ventilating, and refrigeration equipment and systems.

Contained within this law are provisions for the crafts of gas piping, and flue venting of gases which are the byproducts of combustion equipment.

This law sets forth provisions for testing and licensure of contractors based on proficiency testing on the technical requirements for the installation of mechanical equipment and devices, as well as the business practices associated with the mechanical profession. However, individual practitioners performing the installation are not so licensed under the law.

The Plumbing Law provides for the licensure of individuals performing plumbing work, as well as plumbing contractors.

Plumbing is defined as: “the practice, materials, and fixtures, in or adjacent to a building, structure, or premises, used in the installation, maintenance, extension, or alteration of all piping, fixtures, plumbing appliances, plumbing appurtenances, as defined by the code, in connection with the sanitary drainage or storm drainage facilities, plumbing venting systems, medical gas systems, backflow preventers, and public or private water supply systems.”

This legislation places reliance upon the Michigan Plumbing Code for the definition of various components. Section 2 of the code provides for water heaters as a part of the water supply system.

While the Michigan Mechanical Code and the Michigan Plumbing Code contain provisions for water heaters, some clarification is needed to address permitting and inspection requirements.

The codes provide for the regulation of all aspects of the installation of water heaters, the licensing criteria, overlaps and would indicate both licenses are required to replace a water heater. Because the code provisions set forth the specific elements necessary for a safe installation, it is redundant to require two permits for the replacement of a water heater.

Traditionally, both mechanical contractors and master plumbers have replaced water heaters in existing installations. Often these replacements may require some movement of the water, gas and vent lines to facilitate the replacement equipment. This is based on available equipment, size of the replacement device and surrounding conditions that may constrict the installation.

Additionally, requiring two permits is not in the best interest of the public. The purpose of a permit is to provide for the inspection of the device to assure the minimum safety conditions exist to ensure the safe operation of the device. As noted earlier, the two

codes provide sufficient guidance for the installation of water heaters in a replacement environment.

### **Conclusion**

Therefore, the provisions of Technical Bulletin Number 5 remain applicable and only one permit should be secured for the replacement of a water heater. Either a mechanical or plumbing contractor may install replacement water heaters. Both mechanical and plumbing contractors have been sufficiently tested to determine competency in the safe installation of a replacement water heater. Either a mechanical or plumbing inspector may conduct the inspection of a replacement water heater. The scope of limitation of work should be based on a practical application of the code requirements to assure the safety of the device.

Questions regarding this technical bulletin may be directed to the Michigan Department of Energy, Labor & Economic Growth, Bureau of Construction Codes, P.O. Box 30254, Lansing, MI 48909 or by calling the Mechanical Division at (517) 241-9325 or the Plumbing Division at (517) 241-9330.