

## Special Bulletin 2015-04

**April 27, 2015**

**TO:** CMHI Manufacturers

**FROM:** Jess Maxcy

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The attached memo from HUD has been released covering manufacturer's responsibilities pursuant to section 3280.607(b)(3)(v) of the HUD code.

*Should you have any questions, please feel free to contact Jess Maxcy at (951) 683-4053*




U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

APR 24 2015

**MEMORANDUM FOR:** All Manufacturers, PIAs and SAAs

**FROM:**   
Pamela Beck Danner  
Administrator  
Office of Manufactured Housing Programs

**SUBJECT:** Update -Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves)

This is in follow-up to my memorandum of March 10, 2015, that clarified responsibilities and guidance for manufacturers, IPIAs, and DAPIAs pertaining to the installation of mixing valves and water temperature limiting devices (anti-scald valves) for shower and tub shower combinations and for bathtubs and whirlpool baths now required by the Manufactured Home Construction and Safety Standards. Specifically, §3280.607(b)(3)(v), requires:

- Shower and tub-shower combination valves to be either pressure balanced, thermostatic, or combination mixing valves that conform to the requirements of ASSE 1016 – 2005 and having a maximum temperature setting of 120°F, and
- Hot water supply for bathtubs and whirlpool bathtubs to be equipped with a water temperature limiting device that conforms to the requirements of ASSE 1070 – 2004 and will deliver hot water with a maximum temperature of 120°F.
- The installation, accessibility, and testing of the valves and fixtures are critical to ensuring the fixtures perform as required to limit the temperature of the water delivered from the fixture outlets to a maximum of 120° F. Since my prior memorandum was issued, the Department received information from one SAA and have again reviewed product manufacturers' instructions and verified with valve and fixture suppliers that these devices and fixtures are typically **not** being pre-set at the factory of the product suppliers for the maximum temperature setting of 120° F.

As previously indicated, manufacturers need to obtain DAPIA-approval of the product manufacturer installation instructions/specifications for the valves and fixtures as part of their construction design package. It is also the responsibility of the manufacturer to determine appropriate in-factory quality control measures that when followed will result in a home that complies with the above-emphasized standards requirements.

Accordingly, manufacturers must also include procedures in their quality assurance manuals for in-plant water testing in order to verify that the temperature setting for these devices does not exceed a maximum of 120° F. If the valves and fixtures are not temperature-set and verified by the manufacturer as indicated above, the manufacturer's DAPIA approved installation instructions must be amended to include and require that the temperature setting for these devices is to be water tested (24 CFR 3285.603(e)) and verified during the installation/setup of the home, so as to ensure compliance. Alternatively, home manufacturers may want to request that product suppliers pre-set their valves and devices and provide written verification to manufacturers that the setting will not allow hot water to exceed a maximum temperature of 120° F.

As a reminder, access must be provided in accordance with an approved design that will facilitate setting and adjustment of the devices as well as provide for ongoing maintenance in accordance with product manufacturer instructions.

Please forward this memorandum to your manufacturer clients and ensure they understand the importance of the proper installation, accessibility, and testing of these mixing valves and temperature limiting devices. If you have any questions regarding this issue, please contact your agency's HUD liaison of this office at (202) 708-6423.