



OFFICE OF HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

February 12, 2016

MEMORANDUM FOR: All Manufacturers, PIAs and SAAs

A handwritten signature in black ink, appearing to read "Pamela Beck Danner".

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

SUBJECT: Reissuance of Memorandum on Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves)

In August 2015 the Manufactured Housing Consensus Committee (MHCC) discussed and voted on several log items. Log item 127 was a submission by Mark Conte which recommended that:

“Shower, bathtub, and tub-shower combination valves must be balanced pressure, thermostatic, or combination mixing valves that conform to the requirements of ASSE 1016-2005, Performance Requirements for Automatic Compensating Valves for Individual Shower and Tub/Shower Combinations (incorporated by reference, see Sec. 3280.4). Such valves must be equipped with handle position stops that are adjustable in accordance with the valve manufacturer’s instructions to a maximum setting of 120 [deg]F. If the valves require adjustment and/or testing during the installation/set-up of the home, the manufacturer must attach a label to each such valve and fixture as a notification to the home installer and consumer.”

This recommendation was rejected by the MHCC and the MHCC made a recommendation for the Office of Manufactured Housing Programs to send a guidance letter on this topic.

As such, attached is the reissuance of the March 10, 2015, memorandum entitled “Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves)” and the April 24, 2015, memorandum entitled “Update – Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves).”

Attachments




U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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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.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT


WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

MAR 10 2015

MEMORANDUM FOR: All Manufacturers, PIAs and SAAs

FROM:


Pamela Beck Danner
Administrator
Office of Manufactured Housing Programs

SUBJECT:

Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves)

Based on the recent changes to the Standards, requirements are now in place to help reduce the number of injuries and deaths resulting from tap water scald burns to manufactured home occupants. The intent of this memorandum is to clarify responsibilities for manufacturers, IPIAs, and DAPIAs and provide guidance on expectations deemed necessary for ensuring compliance. 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.

Several valve and faucet manufacturer installation instructions have been reviewed and the instructions reviewed have provisions that require proper setting and adjustment in order to ensure compliance with the requirements of the above-mentioned Federal Standards notwithstanding compliance with the product installation instructions. 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.

Accordingly, manufacturers need to obtain DAPIA-approval of the product manufacturer installation instructions/specifications for the valves and fixtures as part of its construction design package. It is also the responsibility of the manufacturer to determine appropriate in-factory as well as on-site (installation) quality control measures that when followed will result in a home that complies with the above-emphasized standards requirements. If the valves and fixtures are not temperature-set at the factory, appropriate and complete instructions must be provided for the installation/setup of the home so as to ensure compliance. Unless required otherwise by each specific product manufacturer, 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.