



MANUFACTURED BUILDING

Toll free 800.587.2716 Tel 919.647.0000 Fax 919.715.0067

MIKE CAUSEY, INSURANCE COMMISSIONER & STATE FIRE MARSHAL
BRIAN TAYLOR, CHIEF STATE FIRE MARSHAL

MEMORANDUM

Date: September 12, 2018

To: Manufactured Home Owners, Building Code Officials and other interested parties

From: Joseph H. Sadler, Jr., PE
Deputy Commissioner
Manufactured Building Division

Re: Damaged Manufactured Home Repair and Inspection Procedures for Consumer's Homes

This memo is in response to storm damage to manufactured homes which have been sold to consumers. It is our Department's responsibility as the staff to the North Carolina Manufactured Housing Board and as the State Administrative Agency (SAA) for HUD to provide oversight and guidance to assist manufactured home consumers in getting the storm damage to their homes properly repaired and inspected. Our efforts are intended to protect all consumers and to give guidance to contractors and building inspectors attempting to repair storm damaged manufactured homes.

STORM DAMAGED CONSUMER'S HOMES Questions and Answers

Question no. 1

My manufactured home was damaged in a storm. Can I get it repaired?

Answer

- Yes, but whether you decide to repair it or not will depend on a lot of factors such as the extent of the damage and the cost of getting the home repaired and inspected.
- Section 1.3.4 of the North Carolina Regulations for Manufactured Homes, 2004 Edition requires that all repairs made to manufactured homes must be inspected by either an independent third party inspection agency approved by HUD, a NC Professional Engineer, an NC Architect, or by your local building inspector.
- When the repairs have been completed, an inspection certification must be issued by the party that inspected the repairs indicating that the repairs have been properly made to your home.

Question no. 2

I want to determine if my damaged used manufactured home can be repaired? Who should I contact first?

Answer

- We recommend that you contact your local building official first. He can quickly determine if your home is safe to enter. If found unsafe, he will have the power disconnected from your home and will notify you of any safety concerns.
- Your local inspector will also be able to inform you if his agency is going to be responsible for inspecting any repairs that are made to your home.

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- Manufactured homes are built under a federal construction/inspection program, which is not under the jurisdiction of your local inspector. Because of this, your local inspector may decide that you will have to contract with either a third party inspection agency approved by HUD, a NC Professional Engineer, or a NC Architect for getting the repairs to your home inspected. Again, when the inspections are complete, a certification must be made by the party which inspected the repairs indicating that the repairs have been properly made.

Question no. 3

We have decided to make the repairs to our damaged used manufactured home. What building code/construction standard will the repairs be required to meet?

Answer

- Manufactured homes are constructed to meet the construction requirements of the Federal 24 CFR 3280, Manufactured Housing Construction and Safety Standards. Most local engineers, architects and inspectors in North Carolina have very little if any experience working with this federal construction code. Refer to Section 1.3.4 of the North Carolina Regulations for Manufactured Homes, 2004 Edition for guidance in the repair of used manufactured homes. This section allows repairs to be made to damaged used manufactured homes in accordance with the North Carolina State Residential Building Code. Because of major differences between the Federal construction code and our NC State Residential Building Code, our Department realizes that it would be difficult if not impossible (impractical) to repair a manufactured home to fully meet the requirements of the NC Residential Building Code. Because of this, we will accept repairs to a damaged used manufactured home which are **made of equal to or better than materials and construction methods as those originally used** when the manufactured home was constructed.

Question no. 4

Where can the repairs be made to my damaged used manufactured home?

Answer

- Repairs can be made at any location found to be suitable to the consumer, contractor and or party that is going to conduct the inspection of the repairs.

Question no. 5

Can I buy a new manufactured home from a retailer that has been damaged?

Answer

- Yes, however, the retailer must bring the home back into full compliance with the Federal 24 CFR Part 3280, Manufactured Home Construction Safety Standards before it can be sold as a new manufactured home.

Question no. 6

Can I buy a damaged new manufactured home from a retailer that is being sold "AS IS" salvage home?

Answer

- Yes, however, because the home is damaged and sold for salvage it no longer certified as meeting the requirements of the Federal 24 CFR 3280, Manufactured Home Construction and Safety Standards. Because the home no longer is certified to meet the HUD construction requirements, the HUD Labels should have been removed by the manufacturer in-plant inspection agency (IPIA). Without these HUD certification labels attached to the home, your local building inspector can no longer accept these units. You will incur major difficulties and major expense in trying to get these salvage units repaired, inspected and

certified to the point where your local inspector can approve its placement within their jurisdiction. We do not recommend purchasing sold "AS IS" salvage homes.

Question no. 6

My local inspector has decided not to do the inspections of the repairs to my damaged used manufactured home. He has instructed me to contract with a HUD approved third party inspection agency, a NC engineer, or a NC architect to conduct the inspections of our home repairs. Where can I get a list of HUD approved third party inspection agencies, NC architect, or NC engineers?

Answer

- A list of approved third party inspection agencies can be obtained from: HUD – Office of Manufactured Housing Programs at 202-708-6423, http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/rmra/mhs/mhshome or from Institute for Building Technology and Safety (IBTS) at 703-481-2000; <http://IBTS.org>. To find an NC engineer or NC architect in your area contact the North Carolina Board of Examiners for Engineers and Surveyors at (919) 791-2000, <http://www.ncbels.org> or the North Carolina Board of Architecture at 919-733-9544, <http://www.ncbarch.org>. You may also find a list of engineers and architects by searching the internet or by looking in the yellow pages of your local phone book. For further assistance, you may also contact the Manufactured Building Division of the Department of Insurance at 919-647-0000, http://www.ncdoi.com/OSFM/Manufactured_Building.aspx.

Question no. 7

When inspecting my damaged used manufactured home, what should I look for?

Answer

- There are many things that should be looked at when inspecting a storm damaged manufactured home. We recommend that someone with extensive knowledge of manufactured home construction and their installation requirements be used to inspect your damaged home. At the very minimum we recommend the following:

General:

Wear protective clothing.

Electrical:

Make sure electrical service is disconnected if the flood water marks are above electrical devices, services, etc.

Building:

Find water marks on your home to make an initial determination of extent of damage.

Look for the following:

- Major structural problems
- Undercut footings
- Leaning, fallen or missing pier supports
- Broken, undercut, loose or missing ground anchors
- Broken, loose or missing anchor straps
- Home moved off foundation
- Home twisted or racked
- Buckled floor/roof/wall sheathing
- Check for damaged finishes
- Ceiling/floor/wall covering
- Roofing/siding have some damaged finishes removed.

- Check for wet ductwork, insulation, wiring/electrical devices

Question no. 8

My damaged used manufactured home had six feet of water in it during the flood. Will my electrical system be safe if I dry it out?

Answer

- **NO!!!** We recommend the following:
 - **Guidelines for Handling Water Damaged Electrical Equipment**

The National Electrical Manufacturers Association (NEMA) has a publication that provides guidelines on how to handle electrical equipment that has been exposed to flooding. Evaluating Water-Damaged Electrical Equipment, NEMA GD 1-2016
<http://www.nema.org/Standards/Pages/Evaluating-Water-Damaged-Electrical-Equipment.aspx>
A copy may also be obtained from the Manufactured Building Division website:
http://www.ncdoi.com/OSFM/Manufactured_Building.aspx
 - Due to the highly polluted nature of the floodwaters, extra care should be used in determining if re-energizing the electrical system is safe. Some things to consider are:
 - **NM Cables** - When Type NM cable has been submerged in water, especially if the ends of the cable have been submerged, it should be replaced.
 - **Wiring Devices** - Sediments and contaminants contained in floodwaters are difficult to remove from the internal parts even if washed with clean water or solution and dried. Such submerged devices should be replaced.
 - **Circuit Breakers and Panelboards** - It may be possible to recondition some of this type of equipment when done by trained personnel in consultation with the manufacturer. This equipment should not be energized until it has been reconditioned or replaced