

Manufactured Building

Wayne Goodwin | Commissioner of Insurance

Tim Bradley | Assistant State Fire Marshal

MEMORANDUM

DATE: February 21, 2011 (replaces May 28, 2009 memo)

TO: Manufactured Home Owners, Building Inspectors, Registered Engineers and Architects, Approved Third Party Certification Agencies, and Other Interested Parties

FROM: Alan D. Greene, P.E.
Chief Building Code Consultant
Manufactured Building Division

RE: Conversion of Manufactured Home to Occupancy other than Single Family Dwelling

Manufactured homes are constructed in compliance with Federal Standards, specifically *Part 3280, Manufactured Home Construction and Safety Standards*. Section § 3280.1 of this document indicates that manufactured homes are to be used exclusively as *dwelling units*. The Manufactured Building Division frequently receives inquiries concerning the use of a manufactured home as a sales office, beauty salon, or other type of commercial occupancy for which the home was clearly not designed. All commercial buildings in North Carolina are required to conform to the requirements of applicable volumes of the North Carolina State Building Code (current editions): -- NC Building Code; Accessibility – NC Building Code, Chapter 11; NC Plumbing Code; NC Mechanical Code; NC Electrical Code; NC Fuel Gas Code; and the NC Energy Conservation Code. Since manufactured homes are constructed to Federal Standards rather than the North Carolina State Building Code, use of these homes *without modification* for other than dwelling units is prohibited. **However, please note that this memo is not intended to prevent any type of business in a manufactured home that would normally be allowed by a local jurisdiction in an unmodified, site built single family dwelling.**

The above restriction notwithstanding, if a manufactured home owner wishes to *upgrade* his or her home such that it meets the provisions of all applicable volumes of the North Carolina State Building Code, this modification will be permitted. The upgraded unit, no longer considered a manufactured home, will be acceptable for the commercial occupancy to which it has been modified. The following steps must be followed in carrying out the upgrade:

1. A professional engineer or architect, currently registered in North Carolina, must be retained to inspect the unit for evaluation of the existing structural, plumbing, mechanical, and electrical systems. This evaluation will determine whether these systems meet all applicable standards in the North Carolina State Building Code for the intended occupancy. If any part of a system is not compliant, the engineer or architect must determine what corrective measures will be required to bring the unit into compliance with current Code standards. This procedure will normally require portions of the walls, ceilings, and/or floors to be removed in order to facilitate an adequate inspection. From this inspection and evaluation the engineer or architect must produce a summary list indicating which items meet current Code requirements and which items must be modified for Code compliance.

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2. All items that are not in compliance with current applicable Code volumes must be modified in accordance with the engineer or architect's specific instructions. All such corrective work must be inspected by the engineer or architect prior to being covered with finished wall, ceiling, or floor material.
3. The engineer or architect must also evaluate the foundation system for the unit to determine if it meets North Carolina State Building Code requirements for the intended occupancy. If the foundation is inadequate, necessary modifications must be specified and inspected after completion by the engineer or architect.
4. All accessibility requirements for the intended occupancy must be provided in accordance with Chapter 11, NC Building Code, current edition and ANSI A117.1-03 (which is referenced in Chapter 11).
5. When all required modifications to the building, including the foundation, have been completed, the engineer or architect must provide sealed documentation to the local building official certifying the he or she has personally inspected all the work and has determined that the building now meets all current requirements of the North Carolina State Building Code for the intended occupancy.

When the above steps are properly completed, it is the opinion of the Manufactured Building Division that a local building official may accept the upgraded manufactured home for use as a commercial occupancy.