

Jim Long  
Commissioner of Insurance  
State Fire Marshal



MANUFACTURED BUILDING DIVISION

## MEMORANDUM

DATE: February 1, 2001

TO: Building Officials, Manufactured Housing Manufacturers, Retailers, Set-Up Contractors and Other Interested Parties

FROM: C. Patrick Walker, P.E.  
Deputy Commissioner  
Manufactured Building Division

RE: Closet Removal in Manufactured Homes

Sizing of private septic tank wastewater systems in North Carolina is generally based on the number of bedrooms included in the home. It has been brought to the attention of this office that some manufactured home dealers and consumers are attempting to circumvent septic tank sizing requirements by removing bedroom closets and declaring those rooms to be for other purposes.

The Department of Housing and Urban Development (HUD) has advised this office as follows relative to HUD regulations:

“§3280.109 (c) requires that every room designed for sleeping purposes shall have accessible clothes hanging space. Removing the clothes hanging space from a room designed and approved for sleeping purposes, would bring the home out of compliance with the Federal Manufactured Home Construction and Safety Standards.”

In accordance with §3282.254 (a), distributors or dealers may not sell or lease or offer for sale or lease any manufactured home not in conformance with Federal standards.

A consumer may not alter the home within the one year warranty period without taking the home out of compliance and thus voiding the manufacturer's warranty. Alterations on used homes or homes that are out of warranty involving the removal of bedroom closets for the purpose of septic tank sizing are acceptable only if approved by local Health Department officials.

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