



COLORADO

Department of Local Affairs

Division of Housing

Memorandum

To: Manufactures of Factory-built Residential Structures, Approved Third-Party Inspection Agencies, Registered Sellers, Registered/Certified Installers, Participating Jurisdictions, and Authorized Independent Inspectors

Cc: Maulid Miskell, Program Manager, Office of Regulatory Oversight

From: James Martino, Program Manager, Building Codes & Standards Section

Date: 03/30/2020

Revision 05/6/2020

Re: Thermal Expansion Control - Water Heaters

Effective 5/6/20 a Temporary Moratorium will be in place relaxing the mandatory requirement of Thermal Expansion Tank unit installation at the factory until a majority decision is reached by the DOH, ORO Technical Advisory Committee.

After further review with members of our Technical Advisory committee and discussion with industry stake holders it has been determined that additional code reverences along with more specific and directive language will help clarify installation requirements.

Some of the initial drivers for the requirement is to ensure the safety of the occupants of these homes. It has been identified that structures that come from a certified factory and are set by certified installers may never be seen by a state inspector. It is not clear that licensed or qualified plumbing tradesmen are being utilized for these installations.

More recent events have identified through a series of complaints that there are some AC items that are not being properly addresses. Additionally many factory built units may go directly to a dealer lot and then be installed in a location (park) where thermal expansion requirements are present but not adhered to. Last but not least it is not clear that the manufacture of the water heating appliance requirements are being consistently followed.