

**Industrialized Buildings
Commission**
◆ **An Interstate Compact** ◆

505 Huntmar Park Drive
Suite 210
Herndon, Virginia 20170
(703) 481-2022
(703) 481-3596 fax
www.InterstateIBC.org

FORMAL INTERPRETATION No. 15-01

Subject: Labeling of Existing Buildings
Reference: UAP, Part IV, Sections 4(A)(7)(e)-(i) and 4(E)
Effective Date: February 9, 2016
[Supersedes FI 15-01 dated April 15, 2015]

ISSUE

Uniform Administrative Procedures permits designated agencies to certify certain existing buildings that were not or may not have been manufactured in accordance with Commission approved compliance assurance programs and building system documents; or that do not comply with the requirements of the new location or use. The Commission has approved the following procedures for assessing, labeling and reporting of industrialized buildings in order to assure participating states of the substantial compliance of these buildings with the construction standards of the destination state(s).

INTERPRETATION

1. **Industrialized buildings bearing a participating-state label** issued prior to the effective date of the UAP are automatically eligible for a Commission certification label.
 - a. Prior to affixing certification labels, the inspection agency must ensure the buildings have not been modified, altered or damaged.
 - b. Commission certification labels must be permanently attached next to the existing participating-state labels. Except for certification label numbers, information on the new and existing data plate must be identical.
 - c. Inspection agency must submit a completed form along with pictures of the existing labels, data plates, and the exterior and interior of the modules, copies of inspection reports and new data plates to the Commission no later than 30 days after receiving Commission authorization to release labels.
 - d. Buildings that are altered or modified must comply with additional requirements specified under UAP, Part IV Section 4(A)(7)(a) through (c).
2. **Industrialized buildings bearing a non-participating state label** must be proven by a designated agency to meet the destination state's codes in effect on the date of manufacture to have a Commission certification label affixed. If the date cannot be determined, the building must meet destination state's current codes. Buildings manufactured prior to the effective date of the UAP are not eligible for certification.

FORMAL INTERPRETATION No. 15-01

- a. Evaluation agencies must perform a full and complete review of the documents approved by or on behalf of the non-participating state. Documentation must be substantially equivalent to that required under MRR, Part V, Section 1(B). A deviation report must identify the differences between the applicable provisions of the non-participating and the destination state's codes. Complete documents of any modification necessary to bring the buildings into compliance with the applicable codes must be submitted to the evaluation agency for review and approval.
 - b. Inspection agency must perform an initial inspection to ensure the original building has not been altered or damaged. All subsequent modifications must be inspected by an inspection agency to ensure compliance with applicable codes and approved designs. Buildings that are altered or modified must comply with the additional requirements of UAP, Part IV Section 4(A)(7)(a) through (c).
 - c. The inspection agency must inspect construction elements, methods or materials for compliance, and require removal of permanent construction where necessary, if the non-participating state approved documents do not conclusively demonstrate compliance with a provision of the destination state's code.
 - d. Designated agency must submit a completed form, along with copies of all relevant documents – such as inspection reports, data plates, and approved designs – and pictures of existing labels to the Commission no later than 30 days after receiving Commission authorization to release labels.
3. **Industrialized buildings bearing Commission certification labels** that do not comply with the requirements of a new location or use must be proven by a designated agency to meet the destination state's codes in effect on the date of manufacture.
- a. Evaluation agencies must review the approved documents under which the building was manufactured for compliance with the requirements of the new location or use. Any modification necessary to bring the building into compliance must be approved by the evaluation agency.
 - b. Inspection agencies must perform an initial inspection to ensure the original building has not been altered or damaged. All subsequent modifications must be inspected by an inspection agency to ensure compliance with applicable codes and approved designs. Buildings that are altered or modified must comply with the additional requirements of UAP, Part IV Section 4(A)(7)(a) through (c).
 - c. Designated agency must submit a completed form, along with copies of all relevant documents – such as inspection reports, data plates, and approved designs – and return existing labels to the Commission no later than 30 days after receiving Commission authorization to release replacement labels.

FORMAL INTERPRETATION No. 15-01

4. **Certification labels** shall only be affixed by the inspection agency to completed, code-compliant industrialized buildings. The Commission will authorize the release of certification labels to the custody of the inspection agency after receiving proper payment.