



MINUTES
MANUFACTURED HOUSING STRUCTURE AND DESIGN SUBCOMMITTEE
Conference Call / Adobe Connect Meeting
April 23, 2013

1. **Call to Order.** The meeting was called to order at 1:03 PM.
2. **Attendance.** A roll call of the subcommittee and introduction of guests was completed. Those present for some or all of the meeting are as follows:

SUBCOMMITTEE MEMBERS PRESENT

Ishbel Dickens
Jeffery Legault
Greg Scott
David Tompos (Chair)
Michael Wade
Frank Walter
Richard Weinert
(NOTE: SC members Anderson and Sheahan were absent)

HUD STAFF PRESENT

Henry Czauski – DFO
Patricia McDuffie
Rick Mendlen

GUESTS

Other MHCC Members
Debra Blake
Jim Demitrus
Dominic Frisina
Tim O’Leary
Manuel Santana

PUBLIC

Holly Allen – Architectural Testing
Rob Luter – AAMA / Kinro
Joe Sadler – SAA-North Carolina
Lois Starkey – MHI

Pat Walker – SAA-North Carolina
Mark Weiss – MHARR
Randall Yarberry – Elixir Industries
Mike Zieman – RADCO

AO

Robert Solomon – NFPA

3. Introductory Remarks.

Mr. Czauski thanked the subcommittee members for their time and for continuing their work on the various subjects they are working on. He noted that notice for this meeting had been published in the Federal Register announcing the meeting and the agenda. He would be serving as the DFO and the subcommittee conference call would be conducted in accordance with the FACA Guidelines, Roberts Rule of Order and the MHCC Bylaws.

4. Discussion Items.

Mr. Tompos thanked the participants for being available for the meeting. He asked for a motion to approve the draft minutes from the October 23-25, 2012 subcommittee meeting. Mr. Walter made a motion to approve the minutes as submitted/Mr. Wade offered a second. There were no comments – Minutes of October 23-25, 2012-Approved as submitted.

Mr. Tompos asked if there were any general comments before looking at the proposals. Mr. Walter asked if the Producer position on the Subcommittee previously held by Bill Stamer had been filled yet. Mr. Czauski indicated that HUD has asked all of the MHCC members appointed in 2012 and 2013 to let him know what subcommittee activity(s) they are interested in. They are to let Mr. Czauski and Ms. McDuffie know about their preferences.

3285, Log#1 – See Enclosure [A]

This proposal has been in the system since 2003. It was originally developed as part of the ground anchor test protocol that was being considered along with the Model Installation Standards. Enclosure A shows not only the proposal itself but also the supporting material that accompanied the proposal and a recent analysis completed by the NTA staff on the content of the information that was originally provided.

Based on a review of the information being provided, several questions and comments were put forth:

- Based on the system analysis, the characteristic of the soil needs to be evaluated and considered in order to select the best anchoring system or method.

- 3285 may allow variations between test protocols in evaluating alternative foundation systems.
- HUD staff indicated there are engineering concerns with both existing test protocols that are being used and approved by DAPIA's and that a common test protocol was needed.

The supplemental analysis done by NTA had only been in the hands of the subcommittee for a short time. Based on this, Ms. Dickens made a motion to TABLE the action on this item (Mr. Walter offered a second) until the next subcommittee meeting. This will give members time to review the NTA information. **Motion to Table PASSED.**

3280, Log#80 – See Enclosure [B]

This proposal intends to clarify the correlation between the small scale and large scale tests when evaluating formaldehyde levels. The current criteria mandate a large chamber test (ASTM E-1333). Introduction and use of a Small Chamber test (ASTM D-6007), as an alternative may be beneficial in the long run as it could improve the time and resources needed to complete the testing.

Several comments and questions on the alternative test approach (ASTM D-6007) were put forth:

- The small scale test would allow the lab to run an equivalency test and make a prediction how the product would perform in the large scale test.
- If this item were to be approved by the MHCC, consideration should be given to adding a new item (b) to the proposed language to read:

3280.406(b) Such equivalency shall be established by laboratories that are accredited by ISO Guide 65, General Requirement for Bodies Operating Product Certification Systems.

- HUD staff raised concerns about replacing the long standing reliable large air chamber test for determining formaldehyde emissions with the small scale chamber test which is not yet proven to be reliable in predicting emission levels or results that would be obtained in a living space environment. HUD staff also indicated the small chamber test uses different loading and air exchange rates which had to be standardized due to the variations in size of the small chamber.
- A SC member noted that for the CARB testing protocol, the large scale chamber test is used almost exclusively. A baseline of anticipated performance could perhaps be based on those test results.
- A distinction and clarification needs to be made to inform all of the affected parties that an alternative test standard does exist. If used as a supplement, or in lieu of the

current rules, guidance should be provided. For example, US EPA could expand on the testing frequency of products or materials.

- Permissible emission rates and how those values are determined have variations. Some of the challenges noted are:
 - CARB drops emission rates to as low as 0.05 for some materials.
 - HUD test protocol (currently) tests products or materials after the finished surface/product is complete.
 - Introduction of adhesives, stains and other materials can have an impact on the emission rate.
 - A product (before in its finished state) may pass but the final assembled product may not meet the criteria.
- The long awaited EPA proposal will need to clarify if the original materials or finished product test will need to be subjected to the test.
- A discussion of the status of the proposed rule from EPA noted the following:
 - EPA needs to issue the NPRM.
 - Public comment period likely to be 30 to 60 days.
 - EPA will need to review and address the public comments.
 - Once EPA issues the final rule, HUD will have 180 days to have something in place in 3280 to implement the new criteria.
 - While manufactured homes are likely to be covered in the new EPA rule, it is important for the MHCC to have a recommendation ready for HUD to act on.
- The subcommittee is holding action in abeyance on this issue – no one can guess how the EPA rule is going to address manufactured housing; or if the rule will look at base product or finished product.
- HUD staff pointed out that the proposal does not recognize the need to also include a provision for frequency of testing in 24 CFR §3280.308 when the small chamber test would be used as the primary method of testing and certification in lieu of the quarterly air chamber tests that are required by the current standards. Mr. Tompos will look into at providing some proposed language.

3280, Log#81 – See Enclosure [C]

This proposal (and Log #82 and #83) work to update several AAMA standards that have been referenced in 3280. Rob Luter, the proponent, was present for the call and provided an overview of the changes in the referenced standards.

Several comments and questions on the 2012 edition of AAMA 1701.2 were put forth:

- Mr. Luter noted the changes to the standard included: Table of Contents added; expanded list of definitions provided; editorial changes made to improve readability; a sash drop test was added; mold assembly test was added; glazing thickness criteria added to conform to ASTM E-1300; reference added to ISO Guide 65; provisions for the type of sealants used clarified to meet or exceed certain minimum standards.
- Frank Walter a subcommittee member questioned if an alternative standard to AAMA 1701.2 existed. Specifically, did NFRC publish a similar document? The response was no – the NFRC standards are primarily there to evaluate energy performance of windows.
- A member of the subcommittee asked what the impact would be on the current windows in production and that are used in manufactured housing. The responses are:
 - Windows being designed and built today already comply with the 2012 edition of AAMA 1701.2.
 - There would be no changes to how the windows are installed.
 - Windows designed and produced under the previous editions of AAMA 1701.2 would remain viable for use.
 - Tests required by current and previous editions of AAMA 1701.2 (including ongoing tests) will be the same.

Based on this discussion, Mr. Walter made a motion to ACCEPT the proposal as submitted (Ms. Dickens offered a second). This will be the action recommended to the MHCC at a future date. **Motion to Accept PASSED.**

3280, Log#82 – See Enclosure [D]

This proposal works to update AAMA standard 1704 that deals with egress windows.

Mr. Luter noted that similar to AAMA Standard 1701.2 previously discussed, similar changes to address the usability and readability of the standard were made. One change in the newer edition relates to a provision that mandates the need to achieve the minimum egress area must be accomplished without removing a sash. AAMA Manufacturers started to incorporate this change on their own in the 1990's (even before the change to the standard was made) knowing that it was coming.

HUD staff noted that they were not aware of any changes to the anthropomorphic data used by HUD in their 1984 studies. This is important to determine if the newer AAMA Standard has different requirements for the area, operating forces, number of latches and similar criteria. If needed, consideration should be given to maintaining the same provisions from the 1984/1985 era concerning these items. Mr. Luter noted that these parts of the standard had not changed.

Mr. Luter had supplied PDF copies of the various AAMA Standards (1701.2, 1702.2, 1704) to NFPA. He gave permission to the AO to share these with the subcommittee. (EDITORS NOTE: AAMA Documents sent to the subcommittee and HUD staff on 4/24/2013).

Based on this discussion, Mr. Walter made a motion to ACCEPT the proposal as submitted (Mr. Scott offered a second). Motion passed. This will be the action recommended to the MHCC at a future date. **Motion to Accept PASSED.**

3280, Log#83 – See Enclosure [E]

This proposal works to update AAMA Standard 1702.2 that deals with swinging doors.

Mr. Luter noted that similar to the other AAMA discussed, changes to address usability and readability of the standard were made. One change in the newer edition relates to a provision regarding the sealants used for the doors. AAMA develops a standard on sealants and that standard is now referenced in AAMA 1702.2. It was clarified that these are the sealants used in the production of the doors.

Based on this discussion, Mr. Walter made a motion to ACCEPT the proposal as submitted (Ms. Dickens offered a second). Motion passed. This will be the action recommended to the MHCC at a future date. **Motion to Accept PASSED.**

NOTE: During discussion on the motion, Mr. Czauski raised a point of order as he found the word “ACCEPT” to be confusing since it was not in Roberts Rule of Order. Subcommittee members were voting to APPROVE the motion to ACCEPT – a very common approach that is consistent with Roberts Rules and one that has worked with no problems since August of 2002 with the MHCC. A subcommittee member urged the issue to be put in front of the full MHCC if deemed necessary.

5. **Adjournment.** Mr. Tompos and Mr. Czauski thanked all of the participants for their time and attendance. The meeting adjourned at 2:20 PM.

