MEMORANDUM FOR:  All Manufacturers, PIAs and SAAs

FROM:  Pamela Beck Danner
        Administrator
        Office of Manufactured Housing Programs

SUBJECT:  Installation of Mixing Valves and Water Temperature Limiting Devices (Anti-Scald Valves)

Based on the recent changes to the Standards, requirements are now in place to help reduce the number of injuries and deaths resulting from tap water scald burns to manufactured home occupants. The intent of this memorandum is to clarify responsibilities for manufacturers, PIAs, and DAPIAs and provide guidance on expectations deemed necessary for ensuring compliance. Specifically, §3280.607(b)(3)(v), requires:

- Shower and tub-shower combination valves to be either pressure balanced, thermostatic, or combination mixing valves that conform to the requirements of ASSE 1016 – 2005 and having a maximum temperature setting of 120°F, and

- Hot water supply for bathtubs and whirlpool bathtubs to be equipped with a water temperature limiting device that conforms to the requirements of ASSE 1070 – 2004 and will deliver hot water with a maximum temperature of 120°F.

Several valve and faucet manufacturer installation instructions have been reviewed and the instructions reviewed have provisions that require proper setting and adjustment in order to ensure compliance with the requirements of the above-mentioned Federal Standards notwithstanding compliance with the product installation instructions. The installation, accessibility, and testing of the valves and fixtures are critical to ensuring the fixtures perform as required to limit the temperature of the water delivered from the fixture outlets to a maximum of 120°F.
Accordingly, manufacturers need to obtain DAPIA-approval of the product manufacturer installation instructions/specifications for the valves and fixtures as part of its construction design package. It is also the responsibility of the manufacturer to determine appropriate in-factory as well as on-site (installation) quality control measures that when followed will result in a home that complies with the above-emphasized standards requirements. If the valves and fixtures are not temperature-set at the factory, appropriate and complete instructions must be provided for the installation/setup of the home so as to ensure compliance. Unless required otherwise by each specific product manufacturer, access must be provided in accordance with an approved design that will facilitate setting and adjustment of the devices as well as provide for ongoing maintenance in accordance with product manufacturer instructions.

Please forward this memorandum to your manufacturer clients and ensure they understand the importance of the proper installation, accessibility, and testing of these mixing valves and temperature limiting devices. If you have any questions regarding this issue, please contact your agency’s HUD liaison of this office at (202) 708-6423.