



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

March 1, 2010

MEMORANDUM FOR: Primary Inspection Agencies

FROM:

A handwritten signature in black ink, appearing to read "W. Matchneer III".

William W. Matchneer III, Associate Deputy Assistant Secretary
for Regulatory Affairs and Manufactured Housing

SUBJECT:

**Field Guidance - Field Installation of Combustion Air Inlets for
Fireplaces and Fireplace Stoves**

It has recently come to our attention that there are questions regarding whether the combustion air inlet or air intake duct for fireplaces and fireplace stoves required by HUD's Manufactured Home Construction and Safety Standards (3280.703, 3280.709(g)) and Model Manufactured Home Installation Standards (3285.505(f)) needs to be installed and extend from a vented crawl space and pass through the skirting to the outside.

These questions arise from consideration of fireplace manufacturers instructions and model building code requirements which permit the air inlet ducts to terminate in the crawl space and be considered "outside", provided the under floor area is unobstructed at least 18" in height, and the crawl space area is provided with non-closeable type vents that are at least twice the net free area of the air inlet duct itself. In addition, there is also confusion regarding whether manufacturers or installers are responsible for providing the air intake duct extension from the under floor area through the skirting.

This will clarify that when skirting is provided, that the installer should install and connect the combustion air duct through the skirting to the outside as required by 3285.505(f). This should be clearly indicated in the manufacturer's installation instructions. The standards do not explicitly require manufacturers to ship the combustion air duct with the home. In our opinion, however, this would be the best way to assure that the type of duct (material, thickness, size) used conforms with the listing for the fireplace or fireplace stove and conforms with the fireplace and home manufacturers installation instructions.

Because of the confusion that exists as to responsibilities between manufacturers and installers for provision and field installation of the combustion air inlet, we intend to present proposals to revise each of the Standards at the Manufactured Housing Consensus Committee meeting in Tulsa, Oklahoma, to clarify the requirements and responsibilities between the parties. Until this matter is resolved, we are deferring any enforcement actions against manufacturers that have not shipped the combustion air inlet duct with their homes.