

Minutes
South Carolina Building Codes Council
Modular Review Committee Meeting
May 21, 2021, 10:00 a.m.
Via Video/Teleconference

Meeting Called to Order

Delisa Clark, Building Codes Council Chair, called the scheduled meeting of the Modular Review Committee to order at 10:01 a.m.

Administrator's Remarks

Maggie Smith reviewed the appointment of the standing Modular Review Committee by the Building Codes Council at their March 24, 2021 meeting, which is intended to assist Council staff with technical reviews and in-state manufacturer plant audits, provide guidance in dealing with special issues, and assist with any other issues that may need further review.

Members of the Committee present included: Delisa Clark, Building Codes Council member; Darbis Briggman, Building Codes Council member; Doug Terrell, Building Codes Council member; Patrick Brown, BOASC; Shell Suber, MHISC; John Murdaugh, City of North Charleston Code Enforcement; and Dennis Jones, MHISC representative.

Members of staff present included: Molly Price, Administrator; Maggie Smith, Program Coordinator; and Stacey Hewson, Advice Counsel.

Ms. Smith reviewed the items sent to Committee members via email in advance of the scheduled meeting to include: a link to the Statutes and Regulations for the Modular Building Program, the HUD audit letter and Program's response letter from the Modular Building Program audit performed on June 2, 2020, a list of the current modular manufacturing facilities in South Carolina, and a draft copy of the audit report form.

Minutes will be posted for this meeting. No members of the public were in attendance.

In-state Manufacturer Plant Audits

Ms. Smith explained that the Council participated in the HUD audit on June 2, 2020, to the benefit of modular manufacturers located in South Carolina, and the audit brought to light the requirement for annual plant audits to be conducted for the manufacturers and third party inspection agencies located in South Carolina. There are currently no third party inspection agencies located in South Carolina.

She stated that the Regulations included in the meeting materials can assist the Committee in determining what needs to be reviewed at these audits, and addressed the audit report form draft to be reviewed and edited by the Committee as needed. She also asked that any Committee members willing

to participate in the plant audits let Council staff know. The list of manufacturers is organized by region of the state, and she can schedule the Committee members according to the region where they reside.

Ms. Smith reviewed the audit report form draft, stating that the content was pulled from S.C. Regulation 8-608(2) which lays out the requirements for the quality control manual required at the time of initial licensure, as well as when any changes are made or the adopted building codes for South Carolina change. She asked that Committee members offer any suggestions for changes to the form.

Mr. Suber asked for clarification on the need to perform these audits, asking if they are required by HUD. Ms. Smith explained that the requirement for annual in-plant audits come from S.C. Regulations, and that participation in HUD's audit was not mandatory but offered benefits to modular manufacturers located in the state. In-plant audits were performed by Council staff in the past, however, it has not been done for at least 7-8 years.

Ms. Smith detailed who from the manufacturer would be asked to participate in the audit, stating that Regulations require that each manufacturer appoint a quality control manager. She asked the Committee members if a representative of the third party inspection agency should be required to participate as well. Mr. Terrell suggested scheduling the audit to ensure that the third party is able to participate, as there may be questions they are more qualified to answer. Several other members suggested that the third party will want to participate if they are aware of the audit. Ms. Price stated that the Council would like to give manufacturers an advanced notice of 1-2 months to allow ample time for the third party to participate as well.

The Committee agreed that the participants of the audit will be as follows: Council staff, one Committee member, the manufacturer's designated quality control manager, and a representative from the third party inspection agency.

Ms. Smith asked for input on the audit report form draft sent to Committee members prior to the meeting. She reviewed the form and stated that Council staff will ensure that updated quality control manuals are received prior to each plant audit. Ms. Price stated that we can send the form directly to the manufacturer. Approval as a fluid document can be sought from the Council so that changes can be made as needed.

Ms. Price stated that now that a Modular Review Committee is appointed the Council staff will keep an eye on modular discussions and issues that arise around the country and through the Modular Building Institute and other outlets, and will bring issues to the Committee for review as needed.

Adjournment

Mr. Suber made a motion to adjourn the meeting, which was seconded by Ms. Clark. The meeting was adjourned at 10:25 a.m.