

# IN-PLANT PROJECT INSPECTION OF MANUFACTURER'S STOCKPILE OF RELOCATABLE BUILDINGS

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<b>Disciplines:</b>	Structural Fire Life and Safety Access Compliance	<b>History:</b>	Issued 12-16-14
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**PURPOSE:** This Interpretation of Regulations (IR) clarifies the inspection oversight responsibilities for in-plant project inspection of a modular building manufacturer's stockpile of relocatable school buildings approved by the Division of the State Architect (DSA) for construction.

**BACKGROUND:** In the special case of a manufacturer's stockpile project approved for construction by DSA, a relocatable building manufacturer constructs one or multiple buildings to have a "stockpile" of school buildings available for distribution. A school district, which is not involved at the time of construction, may purchase or lease these fabricated buildings for expedited deployment onto its school campuses. The Field Act requires that fabrication of a school building receive observation and inspection of the construction by a DSA-certified project inspector. Section 4-333 of the California Administrative Code requires that competent, adequate and continuous inspection be provided; however, an inspector shall not have any current employment relationship with any entity that is a contracting party for the construction.

**INTERPRETATION:** A relocatable building manufacturer shall contract directly with an independent testing laboratory approved by DSA through the Laboratory Evaluation and Acceptance (LEA) program, for services of the engineering manager to provide oversight of the inspection of the stockpile building fabrication. The laboratory engineering manager shall select and hire the in-plant project inspector, and if necessary a special inspector, to provide competent, continuous project inspection and material identification of each building module in accordance with Part I, California Code of Regulations, Section 4-333. An independent LEA-approved engineering manager, licensed in the State of California, is determined by DSA to provide adequate separation between the inspector and the contractor such that the in-plant project inspector is not considered to be hired directly by the contracting party for the construction.

**1. LEA LABORATORY ENGINEERING MANAGER RESPONSIBILITIES FOR MANUFACTURER'S STOCKPILE RELOCATABLE BUILDINGS:** To satisfy the regulations that an inspector may not be in the employ of the contracting entity, a managing professional engineer of a DSA-approved LEA laboratory may be contracted by the building manufacturer to act as an independent entity to hire the project inspector for the construction of relocatable stockpile buildings by that manufacturer. The laboratory engineering manager shall oversee the inspection process to ensure adequate and competent inspection is provided for each building of the stockpile.

**2. OVERSIGHT OF PROJECT INSPECTION, MATERIAL TESTING AND/OR SPECIAL INSPECTION:** The laboratory engineering manager shall perform the following duties:

- Assess in-plant project inspector for knowledge, skills and abilities to perform the observation of construction and to perform the material identification, material testing and/or special inspection.
- Review and complete Section 6 of the DSA 5-PI for the in-plant project inspector and sign the form.

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- Observe the performance of the in-plant project inspector's work to the satisfaction of the laboratory engineering manager that the construction inspection of each building module is in accordance with the DSA-approved plans, and the material identification, material testing and/or special inspection is being conducted in accordance with Title 24, Part 1, Sections 4-333, 4-336 and 4-214.
- Ensure the DSA 5-PI has been approved by DSA prior to start of construction.
- Ensure the DSA 152-IPI is submitted to DSAbox immediately upon completion of construction of each relocatable building.

**3. MATERIAL IDENTIFICATION, MATERIAL TESTING AND/OR SPECIAL INSPECTOR IF PERFORMED BY OTHER THAN IN-PLANT PROJECT INSPECTOR:** If the in-plant inspector lacks the specific knowledge, skills and abilities, and the applicable material testing/special inspector certificates (i.e.: AWS-CWI) to perform the applicable tests or inspections, the laboratory engineering manager shall ensure that the work is conducted by a DSA-certified LEA laboratory or special inspector. The laboratory engineering manager may hire another DSA LEA firm or special inspector to perform the services, or the LEA engineering manager's firm may perform this work if contracted by the manufacturer. If material inspection or special inspection is conducted by an entity other than the in-plant inspector, a DSA 291 form shall be required from the engineering manager of the contracted LEA firm or a DSA 292 form if from a special inspector hired by the LEA engineering manager.

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### REFERENCES:

California Code of Regulations (CCR) Title 24  
Part 1, California Administrative Code, Sections 4-333, 4-336, 4-342, and 4-214  
California Education Code, Sections 17310 and 81142

### ADDITIONAL RESOURCES:

- DSA Interpretations of Regulation IR A-7 and IR A-8
- DSA Procedure PR 13-01
- DSA 5-PI, DSA 152-IPI, DSA 291
- [DSA IR](#) and [Publications Page](#)

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This Interpretation of Regulations (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA which includes State of California public elementary and secondary schools (grades K-12), community colleges and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is reviewed on a regular basis and is subject to revision at any time. Please check the DSA web site for currently effective IRs. Only IRs listed on the Web page at [www.dgs.ca.gov/dsa/Resources/IRManual.aspx](http://www.dgs.ca.gov/dsa/Resources/IRManual.aspx) at the time of plan submittal to DSA are considered applicable.