



Maryland Department of Housing
and Community Development

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MEMORANDUM

Date: October 07, 2015

To: Maryland Approved Testing Facilities (ATF)

From: Norman C. Wang, RA, Manager, Industrialized Building and Manufactured Homes Program,
Maryland Codes Administration

Ref: Using building framing cavities as ducts or plenums in one-and two-family dwellings

The purpose of this memorandum is to clarify the issue of using building framing cavities as ducts or plenums. 2015 IRC Section R102.1 states that where different sections of the code specify different requirements, the more restrictive shall govern. On the issue of using building framing cavities as ducts or plenums, Section N1103.3.5 is more restrictive than Section M1601.1.1 Item 7. Therefore, Section N1103.3.5 **"Building framing cavities shall not be used as ducts or plenums"** should govern over Section M1601.1.1

2015 IECC Section R403.3.5 also prohibits the use of building framing cavities as ducts or plenums.

§§12-307 of the Public Safety Article (PS Article) stipulates that a Testing Facility/Organization (ATF), acting on behalf of DHCD, has the responsibility of determining whether each proposed industrialized building meets the standards contained in the regulations of the Department. Furthermore, the determination shall include the evaluation and testing of the industrialized buildings. Therefore, it is the ATF's responsibility to ensure the industrialized buildings it is responsible for meet all current standards as established by DHCD.

