

PLUMBING AND MECHANICAL
INTERPRETATION MANUAL



CODE: 2003 IRC

DATE:

CODE REF: **M2005.1**

11/5/2003

SUBJECT: Water Heater Drain Pans

(Page 1 of 2)

Section P101.2 clearly identifies the scope of responsibility regarding the code and the “repair, replacement and installation” of water heaters:

P101.2 Scope. The provisions of this code shall apply to the erection, installation, alternation, repairs, relocation, replacement, addition to, use or maintenance of plumbing systems within this jurisdiction. The installation of fuel gas distribution piping and equipment, fuel gas-fired water heaters, and water heater venting systems shall be regulated by the International Fuel Gas Code.

Section RM2005.1 states that that water heaters should be installed in accordance with manufacturer’s installation instructions and the code requirements, Section 2801.5 states that a drain pan and drain **are** required.

RM2005.1 General. Water heaters shall be installed in accordance with the manufacturer's installation instructions and the requirements of this code. Water heaters installed in an attic shall conform to the requirements of §RM1305.1.3. Gas-fired water heaters shall conform to the requirements in Chapter RG24. Domestic electric water heaters shall conform to UL 174 or UL 1453. Commercial electric water heaters shall conform to UL 1453. Oiled-fired water heaters shall conform to UL 732.

RP2801.5 Required pan. Where water heaters or hot water storage tanks are installed in locations where leakage of the tanks or connections will cause damage, the tank or water heater shall be installed in a galvanized steel pan having a minimum thickness of 24 gage (0.016 inch) (0.4 mm) or other pans listed for such use.

RR104.10 Modifications. Wherever there are practical difficulties involved in carrying out the provisions of this code, the building official shall have the authority to grant modifications for individual cases, provided the building official shall first find that special individual reason makes the strict letter of this code impractical and the modification is in compliance with the intent and purpose of this code and that such modification does not lessen health, life and fire safety requirements or structural. The details of action granting modifications shall be recorded and entered in the files of the department of building safety.

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CODE: 2000 IRC

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(Page 2 of 2)

Section RR104.10 addresses modifications where it may be impractical to comply with the code and that by not complying with a specific requirement, it will not lessen the protection provided by those provisions to the occupant or the property.

According to the above provisions, all water heaters would require a drain pan and drain. However, the unanswered question would be “what about existing water heaters and their replacement?” According to section RR104.10, the Building Official may grant modification to the strict enforcement of code provisions when those provisions do not lessen the health, life and fire safety requirements of the structure.

Section 2005.1 states that water heaters shall be installed in accordance with manufacturer’s installation instruction. According to the manufacturer’s installation instructions that I have obtained, it states the following: “...it is **recommended** that a suitable catch pan, adequately drained, be installed under the water heater.”

Therefore, I have determined that an existing water heater installation that was approved under a previous code and does not have an existing drain pan and drain, which is installed in a location where leakage from the water heater will not cause structural damage, will not be required to have a drain pan and drain installed when replaced.

SIGNATURE: *Lonnie Erwin,*

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