

TCEL Special Inspections Position Statement



Background and Purpose: Working in such a large State, our member firms assist clients and building departments with rather large differences in understanding the importance and requirements of Chapter 17 “Special Inspections and Tests” of the International Building Code (IBC). As of February 2015, all states have adopted uniform statewide building codes based on the 2003 or newer editions of the IBC in some manner. This means that some form of Special Inspections are required to be performed per the code as defined in IBC Chapter 17.

Historically, Special Inspections have been inconsistently understood and enforced resulting in different ways of doing business across the state of Texas. The purpose of this document is to provide a summary of Chapter 17 and responsibilities of the key parties necessary to meet requirements for the IBC as they pertain to the services provided by Member Firms.

A requirement for Special Inspections can vary by jurisdiction and is related to the construction of a building or structure.

This Position Statement is intended to be a commentary on Special Inspections and not to replace the requirements of the Code or the Authority Having Jurisdiction (AHJ).

What does the International Building Code say about Special Inspections?

Chapter 1, Section 104:

- The building official is directed to enforce the provisions of the code.
- The building official cannot change the requirements of the code, they can only render interpretations of the code and adopt policies and procedures in order to clarify provisions in their area of jurisdiction.
- In adopting policies in their jurisdiction, the building official should compose and publish a Published Policy Statement.

- Member firms should become familiar with the published policy statements for those jurisdictions to which they are proposing or providing services.
- The building official can either perform the required inspections themselves or accept reports of inspections by approved agencies or individuals.

Chapter 1, Section 105:

- The building official shall examine the application for permits (including the required submittal documents, Section 107). Issuing a permit is approving the required project-specific Statement of Special Inspections as written.

Chapter 1, Section 107:

- The building official is authorized to require the owner or owner’s agent to engage and designate a Registered Design Professional (RDP) who shall act as the Registered Design Professional in Responsible Charge (RDPiRC).
- The RDPiRC is responsible for reviewing and coordinating submittal documents submitted to the building official (also stated in Chapter 17, Section 1704.3).
- Submittal documents include construction documents, Statement of Special Inspections, geotechnical report, etc. These documents shall be submitted prior to the issuance of a building permit.

Chapter 1, Section 110:

- Lists Special Inspections as a requirement for any work that is permitted.

Chapter 17 Special Inspections and Tests:

- Expands on the inspections of Chapter 1 by requiring Special Inspections. Special Inspections and tests are in addition to inspections made by the building official identified in Chapter 1, Section 110.
- Section 1704.2 – Special Inspections are required where an application is made to the building official for construction for the types of work listed in 1705 (steel construction, concrete construction, masonry construction, wood construction, soils etc.). The



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project specific Statement of Special Inspections submittal is a requirement prior to the issuance of a building permit.

- The contractor cannot contract, hire or pay for Special Inspections unless the contractor is also the owner. Member firms should not propose or provide Special Inspections as Agent for the Contractor.
- Section 1704.4 requires the Contractor to provide a statement of responsibility acknowledging their understanding of maintaining control of the construction of specific systems and elements listed in the statement of Special Inspections. While it may not be directly required by the code, the need to hold a preconstruction meeting for the projects regarding Special Inspections can be indirectly inferred. The owner or owner's agent, contractor, RDPs/RDPiRC and the approved Special Inspections agency(s) should be required attendees. The preconstruction meeting should be used to review the Special Inspection plan requirements and clarify the roles when used properly. This is routinely overlooked by Owners, Contractors and Municipalities. The Member Firm should be made aware and attend preconstruction meetings. The Special Inspection firm should make a written request to attend to their client.
- Section 1704.2.5 requires Special Inspections of structural, load-bearing or lateral load-resisting members fabricated on the premises of a fabrication shop, except where the fabricator has been approved to perform work without Special Inspections in accordance with 1705.2.5.1. Approval shall be based on review of the fabricator's quality program with periodic auditing by an external approved accrediting agency or the building official. At the completion of fabrication, the approved fabricator shall submit a certificate of compliance to the owner or owner's agent. Member firms should make sure they understand these requirements in the proposal phase. If clarification is needed, request it early!
- The owner or the owner's authorized agent is required to issue a final report documenting required

Special Inspections were performed and any discrepancies corrected. Section 1704.2.4 is clear that the final report is provided by the RDP, not the Special Inspector.

Responsibilities

Building Official (AHJ) will:

- Approve Special Inspection agencies or individuals capable of performing the required Special Inspections.
- Have a published policy statement with requirements clearly available and posted.
- Host the required preconstruction meeting.

Registered Design Professional In Responsible Charge (RDPiRC)

- The RDPiRC shall prepare a project specific statement of Special Inspections when required by the Code. It should restate the requirements for the RDPiRC to issue the final sealed report as well.
- ***The Special Inspections and Testing Agency is NOT the RDPiRC and should not prepare the project specific Statement of Special Inspections nor sign and seal City templated final report of Special Inspections that is clearly stated to having been authored by the RDPiRC.***

Owner or Owner's Authorized Agent

- The owner shall employ one or more approved agencies to provide Special Inspections and tests during construction per the project-specific Statement of Special Inspections.

Contractor

- The construction or work for which Special Inspections or testing is required shall remain accessible and exposed for the completion of the required Special Inspections or tests.
- The contractor shall be familiar with the required Special Inspections and tests and schedule these services with the approved agencies in a timely



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manner.

- The Contractor should maintain regular communication with the Special Inspection Agency throughout the life of the project regarding Special Inspection scheduling and tracking.

Special Inspections and Testing Agency

- Approved agencies shall demonstrate competence and relevant experience or training of the special inspectors.
- Approved agencies shall keep records of Special Inspections and tests and submit these reports (including discrepancies noted as applicable) to the project stakeholders.
- Discrepancies shall be brought to the immediate attention of the contractor for correction and tracking in their inspection/deficiencies log.
- A project deficiency or non-conformance log should be maintained as a living document to facilitate scheduling necessary re-tests/re-inspections and final project closeout.
- A final report or letter documenting the required Special Inspections and tests, and any unresolved discrepancies noted shall be submitted.
- TCEL recommends our member firms review the Statement of Special Inspections and discuss with the RDPiRC.

TCEL Recommendations for Engaging and Hiring Special Inspections and Testing Agencies

Special Inspections and testing agencies should generally have the following qualifications:

- A national accreditation such as AASHTO or A2LA.
- Personnel with documented training and/or certifications (such as ICC or NICET) along with an adequate experience level to perform the Special Inspections and testing services.
- Member Firms should have their process/procedures documented in their respective firm Quality Manuals to substantiate this. If a Member

Firm is providing services in a jurisdiction that has not "set forth" the education/training requirements for special inspectors, they should issue a letter to the Building Official setting forth such requirements/evaluations.

- Consideration should be given to the complexity of the project.
- Work should be performed under the direction of a licensed professional engineer competent in the area of the work for services provided.

TCEL encourages the Special Inspections and Testing Agency to request invitation and attend the required preconstruction meeting.