



CAL FIRE - OFFICE OF THE STATE FIRE MARSHAL

Code Interpretation 26-04

Issued: July 9, 2026

Fire Sprinklers - Commercial Modulares

OVERVIEW

Edition: Title 19, California Code of Regulations – Public Safety
Code: Division 1 – State Fire Marshal
Section(s): Chapter 5.5, Article 3, Subsection 925. General Provisions
Requested By: Randy D. Roxson, Executive Director, Sprinkler Fitters Association of California
Date Received: August 21, 2025

Note: For this Code Interpretation, “commercial modulares” are defined in the Health and Safety Code (HSC) [Section 18001.8](#) to mean a structure transportable in one or more sections, designed and equipped for human occupancy for industrial, professional, or commercial purposes, which is required to be moved under permit, and shall include a trailer coach as defined in [Section 635](#) of the Vehicle Code. “Commercial coach” has the same meaning as “commercial modular.” HSC [Section 18026](#) establishes the authority that all commercial modulares must bear an insignia of approval issued by the Department of Housing and Community Development (HCD), which indicates compliance with regulations adopted at the time of manufacture. Title 25, California Code of Regulations (CCR), [Section 4032](#) clarifies that all commercial modulares designed for use in the State of California must bear an Insignia and establishes the requirements and location of such insignia.

QUESTION #1

Must an individual be a State Fire Marshal Certified Sprinkler Fitter to install fire sprinkler systems in commercial modular buildings built in factories located in California?

ANSWER #1

Yes. Per Title 19, CCR, [Section 925](#), no individual shall perform the installation of water-based fire protection systems within the State of California without first obtaining certification or registration from the Office of the State Fire Marshal (OSFM). This requirement is subject to the exemptions outlined in [Section 923](#), which exclude certain types of work—such as installations in one- and two-family residential sprinkler systems, underground supply lines up to the system riser, and pre-engineered water-based fixed extinguishing systems.



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QUESTION #2

Must an individual be a State Fire Marshal Certified Sprinkler Fitter to install fire sprinkler systems in commercial modular buildings built in factories located outside of California (out of state or out of the country)?

ANSWER #2

No. Individuals installing fire sprinkler systems in commercial modular buildings that are constructed outside the State of California (out of state or out of the country) and subsequently transported into California are not required to hold California sprinkler fitter certification.

However, any modification, alteration, or field installation of fire sprinkler components performed after the unit arrives in California may be subject to certification requirements under Title 19, CCR, [Section 925](#), unless exempted by [Section 923](#). HCD's [Information Bulletin 2016-02 \(MH\): Commercial Modular Units – Building Standards and Ordinances](#) (April 20, 2016) provides additional guidance on tenant improvements for commercial modulars.

QUESTION #3

If the answer to Question #2 above is no, upon entering California, would the fire sprinkler system be required to be inspected and certified by a State Fire Marshal Certified Sprinkler Fitter?

ANSWER #3

No. The HCD insignia signifies that the unit has been constructed and inspected in compliance with the applicable building standards adopted by HCD, including fire protection systems. Additional information on HCD requirements can be found in Title 25, CCR, [Section 4353](#).

QUESTION #4

Must the person making the connection between the commercial modular building and the water supply be a State Fire Marshal Certified Sprinkler Fitter?

ANSWER #4

No, a certified sprinkler fitter is not required to make the connection in this instance. Pursuant to California Code of Regulations (CCR), Title 19, [Section 923](#), Exception 2, this type of work falls outside the scope requiring certification. This exception is consistent with the guidance issued by the California State Contractors License Board in Spring 1990, which clarified that the installation of the underground water supply line—from the system shutoff or fire department connection to the first joint or mechanical



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connection above grade or within the building—may be performed by appropriately licensed contractors provided they hold the proper license classification for such work.