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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2018-01-IBS-15-1.1-2(k)

**Building or Fire Safety Law Interpreted**

[675 IAC 15-1.1-2\(k\)](#) "Industrialized building system" means any part of a building or other structure that is in whole or in substantial part fabricated in an off-site manufacturing facility for installation or assembly at the building site as part of a Class 1 structure, a Class 2 structure, or another building or structure.

**Issue**

The question has arisen whether a premanufactured walk-in cooler or freezer must meet the requirements of the Indiana Industrialized Building Systems rules, resulting in the need for a state IBS seal to be affixed to the unit in question.

**Interpretation of the State Building Commissioner**

Walk-in coolers and freezers, when located inside another structure, are not Class 1 or Class 2 structures themselves, nor are they typically a permanently installed part of any Class 1 or Class 2 structure's integral architectural, structural, HVAC, plumbing, or electrical systems. Rather they are items of restaurant/food service industry equipment. Like appliances, they can usually be disconnected and removed from the facility without modification of the structure or building, or its associated systems.

If they are installed in such a manner, and are not in whole or in part integral to the building or structure that contains them, they are not considered "part" of that building or structure, and therefore do not meet the definition provided in [675 IAC 15-1.1-2\(k\)](#), and are not regulated under the Indiana Industrialized Building Systems rules.

However, if the unit is located exterior to the building it serves, or alone on its site and exposed to the elements, it is a structure in and of itself. It becomes Class 1 if occupied in a manner that meets the requirements of [675 IAC 12-6-2\(b\)](#), and it must comply with all rules regulating such structures, including, if applicable due to the nature of its manufacture, the Indiana Industrialized Building Systems rules.

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