

Construction Industry Communication #32

From: Amit Ghosh, Chief Building Official

Re: M/E/P Trade Permit Applications Requiring Either:

1.) Independent plan review when not associated with a building permit.

2.) Building permit

Date: November 25, 2009

Background: Applicants have often inquired as to the permit process for a commercial or multi-family building/structure when the work proposed involves only mechanical, electrical, or plumbing trade work (or combination thereof). In some cases, a building permit may be required. In other cases, only a trade permit is necessary.

Notwithstanding, the applicant is incorrect to assume that construction documents are not required when only proposing M/E/P-related changes to a building/structure. OBC 106.1 entitled Submittal Documents states: *"Before beginning the construction of any building for which construction documents are required under section 105, the owner or the owner's representative shall submit construction documents to the building official for approval."* OBC 106.1.1 further states: *"Construction documents shall include information necessary to determine compliance...such as: (9) Complete description of the mechanical and electrical systems, including: materials, routing, and sizes of all piping; location and type of plumbing fixtures and equipment."* Considering that OBC 108.2.9 requires trade inspections to be performed in accordance with the approved construction documents, additional information will be required to be submitted for plan approval when only M/E/P trade work is proposed.

Requirements: The following outlines when either a(n):

- (1) Independent plan review is required for work only involving mechanical, electrical, plumbing or a combination thereof.
- (2) Building permit is required for M/E/P trade-related work.

1. M/E/P work that requires independent plan review w/ no building permit required (M/E/P trade permits only)

Trade work involving one M/E/P trade only such as, but not limited to:

- Extensive modification of ventilation ductwork or building services piping.
- Replacing existing, exposed plumbing systems (see OPC 202 for definition) with installation of new plumbing systems including water supply, drain/waste/vent piping and fixtures.
- Replacement of grease trap/interceptor/3-compartment sink in existing, approved, commercial kitchen or other facility requiring a

- Food Service License or a Retail Food Establishment License.
- Electrical equipment installation/modification/replacement such as indoor generator, switchgear, service, additional panels, transformers, UPS, etc..
- Outdoor generator installation (PLEI/PLEX to be reviewed by One-Stop Shop (OSS) office to determine if routing to other city agencies is necessary).
- Commercial kitchen hood replacement.
- Building-supported HVAC equipment replacement with equipment similar in size, weight, and orientation.

Trade work involving multiple M/E/P trades such as, but not limited to:

- Electrical equipment installation/modification/replacement as outlined above requiring additional HVAC equipment due for ventilation purposes
- Building-supported HVAC equipment replacement with equipment similar in size, weight, and orientation (incl. electrical)
- Commercial kitchen hood replacement (incl. electrical)

Construction documents submitted for independent plan review shall bear the seal of a registered design professional per OBC 106.2. Construction documents must be accompanied by a building permit application requesting independent plan review for applicable trade(s). Fees will be charged as indicated in the current Fee Schedule. The current fee schedule can be found in the online document library:

[2026-fee-schedule-final.pdf](#)

Note: Work associated with an independent, trade specific plan review will only be issued a Certificate of Completion upon verification by inspection that the work was completed in accordance with the approved documents.

2. M/E/P work that requires a building permit

M/E/P work requiring structural inspections due to structural modifications such as, but not limited to:

- Installation of new plumbing systems including water supply, drain/waste/vent piping in existing and/or new walls and/or floor ceiling assemblies.
- Installation of new, building-supported HVAC equipment.
- Building-supported HVAC equipment replacement with equipment of increased size, weight, orientation.
- New commercial kitchen hood.
- Interior/Exterior walk-in cooler (exterior cooler requires site plan review by OSS).

M/E/P work only when associated with a change of occupancy such as, but not limited to:

- Mechanical, plumbing and/or electric work proposed for beauty salons, barber shops, commercial kitchens and other occupancies not previously approved as such.

M/E/P work such as, but not limited to:

- An existing occupancy (e.g. - group M golf shop) converted to a similar occupancy (e.g. - group M flower shop) where only mechanical, plumbing and/or electrical changes are proposed.

Complete, coordinated, construction documents are required in accordance with OBC 106.1. Coordinated construction documents submitted for building permit shall bear the seal of registered design professional acting in responsible charge for the project per OBC 106.2. Building permit fees will be assessed in accordance with the current Fee Schedule.

Revised 4/3/2026