



## **Minor Mechanical Labels**

**Category:** Commercial Construction and Residential Construction

**Revised:** **April 17, 2024** [David Kuhnhausen], Interim Director

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### **BACKGROUND**

Oregon Revised Statutes Chapter 455.046 establishes special alternative inspection programs for commercial and industrial and one and two family dwelling installations for projects other than new construction. One of these programs is the Minor Label Program. Implementation rules for commercial and industrial and one and two family dwelling minor labels, adopted by the Building Codes Division, are contained in Oregon Administrative Rules (OAR) 918-100-000 through 918-100-060. The rules implement the statute for the Oregon Structural Specialty Code, the Oregon Mechanical Specialty Code, and the Oregon Residential Specialty Code.

Minor mechanical labels may be used in lieu of regular mechanical permits for certain types of installations. Minor labels cost less than equivalent permits. Limited, randomly selected inspections are made to ensure installations comply with the Oregon Mechanical Specialty Code and the Oregon Residential Specialty Code. The lower price of minor labels reflects the lower costs associated with making the limited, randomly selected inspections.

Contractors having verifiable Construction Contractors Board registrations, as well as commercial and industrial building owners and their agents are eligible to purchase and use minor labels. Minor Labels may only be used by the original purchaser. A minor label is only required when the installation otherwise requires a mechanical permit. Nothing prohibits purchase of a regular mechanical permit for installations covered by the minor mechanical label program.

## **A. Definitions**

**Accessible:** Installations that can be easily inspected because the work is in the open or because there is a designed permanent physical access such as an access panel, door or similar entry.

**Commercial and Industrial:** Any occupancy other than one and two family residential use.

**Dwelling:** Any building that contains one or more dwelling units that are occupied or intended for living purposes.

**Dwelling Unit:** A single unit providing complete, independent living facilities for one or more persons, including provisions for living, sleeping, eating, cooking and sanitation.

**Minor Label:** Adhesive sticker sold by a jurisdiction which identifies the jurisdiction issuing the label; label number; installation date; job address; work description; building owner's/owner's agent's/contractor's name, address and phone number; and name of the person doing the work.

**Minor Label Log:** A record of installations made under a minor label.

### **New Construction:**

1. Creation of a new building shell, commercial/industrial structural retrofit, installation or alteration of load bearing walls, foundations or exit passageways;
2. Installation of mechanical and plumbing products as part of the work described in 1. above;
3. Any structural, mechanical or plumbing work performed in connection with changing the use or occupancy classification of the building;
4. Any addition which increases the square footage of the building or structure; or
5. Remodeling within an occupied existing shell which results in:
  - a. Vacation of more than 25 percent of commercial/industrial occupants within a floor or building resulting from remodel;
  - b. Termination of a commercial/industrial tenant's usual activities for more than five working days; or
  - c. Construction which involves more than 25 percent of the area on any floor in a commercial/industrial building.

**Occupancy Classification:** The designation of a building according to its use or the character of its occupancy into one or more of the occupancy groups as provided in the Oregon Structural Specialty Code.

**Project:** Not more than one minor label may be used per calendar month for each tenant space or dwelling unit.

**Repair and Maintenance:** Restoring accessible or existing appliances, appurtenances, fixtures, wastes, vents or distribution pipes in buildings or structures to a safe and sanitary condition.

**Replacement:** Exchanging an existing structural component or mechanical or plumbing product for a similar item which:

1. Does not change the source or location of power;
2. Does not exceed the design capacity of the existing system; and
3. Meets current accessibility and earthquake requirements.

**Sleeping Unit:** A room or space in which people sleep, which can also include permanent provisions for living, eating, and either sanitation or kitchen facilities but not both.

## **B. Installations Allowed**

1. The following work **may** be done under a Minor Mechanical Label. Other trade permits may also be required:
  - a. Moving or replacing duct work not involving fire dampers or penetrations of fire walls, fire assemblies or floors;
  - b. Moving or replacing grills in duct work;
  - c. Replacing existing same fuel heating, cooling and ventilation equipment of equal or less weight (minor alteration of gas piping involving not more than 6 feet of gas piping, and minor alterations to existing venting systems permitted to allow for unit configuration);
  - d. Installation of automatic emergency fuel gas shut off valves;
  - e. Addition of central air conditioning system to existing heating system accessory to one and two family dwellings;
  - f. Replacement of existing electric furnace with or addition of heat pump system accessory to one and two family dwellings;
  - g. Mechanical exhaust for radon mitigation systems in one and two family dwellings;
  - h. Replacement of mini-split-system heat pumps; or
  - i. New mini-split heat pumps in one and two family dwellings.

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2. The following work **may not** be done under a Minor Mechanical Label:
  - a. New construction;
  - b. Work on smoke evacuation systems;
  - c. New smoke control systems;
  - d. Replacement of fuel burning equipment which requires replacement of existing venting system; or
  - e. Commercial replacement of systems involving more than 2,000 cfm of air movement capability, equipment weighing more than 400 lbs, 5-ton cooling capacity.
3. Restrictions:
  - a. A minor label is only required when the work otherwise requires a permit.
  - b. Work must meet the requirements of the Oregon Mechanical Specialty Code or the Oregon Residential Specialty Code.
  - c. No more than one minor mechanical label may be used on any single project.
  - d. A minor label can only be used for one of the above allowed items on any given minor label.
  - e. City of Portland minor labels may only be used for work within the City of Portland Bureau of Development Services' (BDS) jurisdiction.

### **C. Who is Eligible to Purchase**

In order to purchase and use minor mechanical labels, the applicant must be a:

1. Contractor having a verifiable Construction Contractors Board registration.
2. Commercial and Industrial building owner; or
3. Commercial and Industrial building owner's agent; or

### **D. How to Purchase**

Labels are available for purchase in multiples of ten from the Bureau of Development Services. There are two options for requesting new minor mechanical labels.

1. Submit applications online to: [TradePermits@portlandoregon.gov](mailto:TradePermits@portlandoregon.gov). Please allow up to 2 business days for processing minor label applications.
2. Submit hard copy applications to: 1900 SW 4<sup>th</sup> Avenue, Portland, OR 97201. Please allow up to 4 business days for processing minor label applications

Returns of used minor mechanical label logs are emailed directly to [BDSInspections@portlandoregon.gov](mailto:BDSInspections@portlandoregon.gov).

**Incorrect submittals for new applications or incorrectly returned logs will result in additional processing delays.**

\*\*\*BDS will only allow a **MAXIMUM total** of 4 logs out in application or issued status at any time. \*\*\*

**NOTE:** *Minor mechanical labels expire 6 months from date of purchase, with possible extension for an additional 6 months. They are not refundable and are not transferable.*

## **E. Using Minor Labels**

The minor label user:

1. Verifies the installation is allowed under the minor mechanical label program and that the job address is within the City of Portland Bureau of Development Services' jurisdiction (see Section B above).
2. Is responsible for ensuring compliance with the Portland Zoning Code relative to setback, design, and other location requirements. For additional zoning information, please visit [www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds), and click on the Zoning/Land Use tab or call the Zoning Information Line at 503-823-7526.
3. Records the installation on the minor label log ("MB log"). (Please use a ballpoint pen and check that the information on page two of the form is legible.)
4. Lists all required information on the label and affixes the label inside the electrical panel **at the start of the job**.
5. Returns the minor label log to: [BDSInspections@portlandoregon.gov](mailto:BDSInspections@portlandoregon.gov). After the ten minor labels are used or within six months from the issue date of purchase, whichever occurs first. The contractor retains the contractor copy for their records.
6. **MB logs returned past the 6-month deadline will be immediately voided and require full mechanical permits and inspection of each site's installation.**
7. **MB logs returned with ANY minor label installation dates pre-dating the MB log issued date will be immediately voided and require full mechanical permits pulled and inspection of each site's installation.**

**NOTE:** If two or more logs are voided for the reasons above within a three-year period the city will suspend the contractor's ability to purchase additional logs of minor labels for a period of one year.

## **F. Inspections**

The Bureau's Inspection Division (Residential or Commercial sections) will randomly select one or more of the minor label's installations listed on the returned log for inspection. The Minor label contractor is responsible for scheduling and arranging necessary access to the installation for inspection. If the inspected installation is in violation of the Oregon Mechanical Specialty Code or Oregon Residential Specialty Code, violations will be cited, and the minor label failed.

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The contractor will be required to pull a full mechanical permit for all failed labels. Mechanical permit fees will be accessed per the current fee schedule at [COP Building and Other Permits Fee Schedule FINAL.xlsx \(portland.gov\)](#).

- If violations are cited on the **first** label inspected, **a second** label will be selected for inspection from the same log.
- If violations are cited on the **second** label inspected, **a third** label will be selected from inspection from the same log.
- If violations are cited on the **third label** inspected, **all the remaining labels will require full mechanical permits for the installation**, as well as approved inspections.
- If two or more lots of labels are failed within a three-year period the City will suspend the contractor ability to purchase additional logs of minor labels for a period of one year.

The Residential or Commercial Inspections Divisions notify the minor label user of corrections, additional inspections, and fees required.

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Updates August 1, 2017 edition  
Updates July 15, 2015 edition  
Updates July 1, 2011 edition  
Updates November 1, 1997 (February 2009) edition  
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