



UL 2755 and Modular Compliance

As data center infrastructure becomes more equipment-intensive, prefabricated modular units are becoming a more common way to package electrical, cooling, and IT systems before they arrive on-site. That approach can help streamline installation, but it also raises an important compliance question. Is the unit being reviewed as equipment or as a building?

Many of these factory-built, skid-mounted units are designed as non-occupied equipment enclosures with exterior-only service access. When designed that way, they may follow one review process. If the unit includes interior access, walkable space, or a side-hinged man door, the review can change.

UL 2755 addresses one part of that review. A UL 2755 listing can help demonstrate product safety and design consistency, but it does not replace state or local requirements, serve as a permit, or determine whether a unit is treated as equipment or as a building.

“How a modular data center unit is classified affects permitting, approvals, and code requirements.”

The Limits of UL 2755

UL 2755 is a safety standard for prefabricated modular data center systems and related modular units. It provides a way to evaluate these units as repeatable manufactured products, including how equipment, enclosures and related systems are integrated before shipment.

The standard is not a building code. It does not replace the International Building Code (IBC) or the International Residential Code (IRC), and it does not



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take the place of state or local review. A UL 2755 listing can help demonstrate product safety, but it does not decide whether a unit will be treated as equipment or as a building. That classification is made by the authority having jurisdiction (AHJ) and can affect the compliance process.

Why Access Can Change the Review

The side-hinged man door is one design feature that should be addressed early in the process.

A prefabricated modular unit designed for exterior-only service access, where a technician reaches in but does not fully enter, may be considered an equipment enclosure. If the design includes a side-hinged man door, a walkable interior space, or required human entry for service, the authority having jurisdiction (AHJ) may consider the unit a building. This can bring in state modular building requirements even if the unit is already UL 2755 listed.

When State Modular Rules May Apply

If a prefabricated unit is classified as a building, state modular program requirements may apply regardless of UL listing status. This can require a separate regulatory process that includes plan review, in-plant manufacturing inspections, and state-specific labeling or insignia.

Common conditions for this classification include:

- Interior access through traditional doors
- Walkable aisles or floor space
- Human entry for service or maintenance
- Systems designed to support people, such as comfort HVAC or plumbing

- Multi-module assemblies that create egress or access considerations
- Equipment that cannot be serviced from the exterior

Final classification depends on the unit's design, intended use, access conditions, applicable state rules, and AHJ review.

Aligning Product Safety and Modular Approval

Intertek helps project teams evaluate whether a prefabricated data center or equipment enclosure is more likely to be treated as equipment, a modular building, or both.

That early review can help determine whether the project needs UL 2755 listing support, state modular compliance, or both. Intertek provides data center testing, inspection, commissioning, and certification services, along with modular building support that complies with state-specific rules and regulations.

Click here to learn more about Intertek's **data center services** and **modular building solutions**.

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1.800.WORLDLAB



icenter@intertek.com



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