



DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION
OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT

APPLICATION FOR HCAI PREAPPROVAL OF
MANUFACTURER'S CERTIFICATION (OPM)

OFFICE USE ONLY

APPLICATION #: OPM-0681

HCAI Preapproval of Manufacturer's Certification (OPM)

Type: ☐ New ☒ Renewal/Update

Manufacturer Information

Manufacturer: Modular Services Company

Manufacturer's Technical Representative: Sean Flanagan

Mailing Address: 500 E. Britton Rd, Oklahoma City, OK 73114

Telephone: (405) 471-9100

Email: sflanagan@modularservices.com

Product Information

Product Name: 7500 Series Semi-Recessed Form/Method/H-Core/Renew Headwall System Semi-Recessed Mount

Product Type: Hospital Headwall

Product Model Number: 7500

General Description: Headwall System

Applicant Information

Applicant Company Name: Modular Services Company

Contact Person: Sean Flanagan

Mailing Address: 500 E. Britton Rd, Oklahoma City, OK 73114

Telephone: (405) 471-9100

Email: sflanagan@modularservices.com

Title: Sr. Product Development Engineer

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STATE OF CALIFORNIA – HEALTH AND HUMAN SERVICES AGENCY





DEPARTMENT OF HEALTH CARE ACCESS AND INFORMATION
OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT

Registered Design Professional Preparing Engineering Recommendations

Company Name: CYS STRUCTURAL ENGINEERS, INC.

Name: Dieter Siebald

California License Number: S4346

Mailing Address: 2710 Gateway Oaks Drive, Suite 190N, Sacramento, CA 95833

Telephone: (916) 920-2020

Email: dieters@cyseng.com

Certification Method

Testing in accordance with: ☐ ICC-ES AC156 ☐ FM 1950 ☐ ASHRAE 171 ☐ FEMA 461

☐ Other(s) (Please Specify): _____

*Use of criteria other than those adopted by the California Building Standards Code, 2025 (CBSC 2025) for component supports and attachments are not permitted. For distribution system, interior partition wall, and suspended ceiling seismic bracings, test criteria other than those adopted in the CBSC 2025 may be used when approved by HCAI prior to testing.

☒ Analysis

☐ Experience Data

☐ Combination of Testing, Analysis, and/or Experience Data (Please Specify): _____

HCAI Approval

Date: 7/31/2025

Name: Timothy Piland

Title: Senior Structural Engineer

Condition of Approval (if applicable): _____

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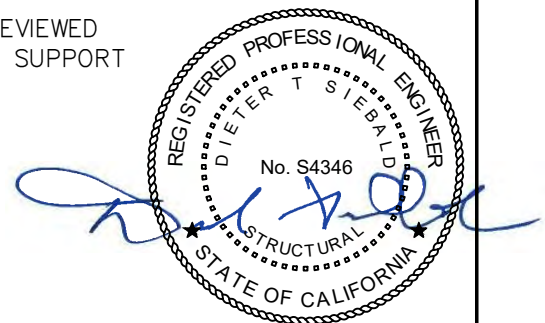


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OPM-0681

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NOTES:

1. THESE DRAWINGS ARE PREPARED FOR MODULAR SERVICES COMPANY, OKLAHOMA CITY, OK.
2. THE CONTRACTOR AND INSPECTOR OF RECORD SHALL OBTAIN A COPY OF THIS PRE-APPROVAL FROM THE DEPARTMENT OF HEALTH CARE ACCESS & INFORMATION (HCAI) OFFICE OF STATEWIDE HOSPITAL PLANNING AND DEVELOPMENT (OSHPD) PRE-APPROVAL PROGRAMS WEBSITE.
3. THIS PRE-APPROVAL COVERS THE SUPPORTS AND ATTACHMENTS OF THE HEADWALL TO THE SUPPORTING STRUCTURE. THE HEADWALL IS SUPPLIED BY THE MANUFACTURER. THE SCREWS, CONCRETE ANCHORS & SUPPORTING FRAMING SHOWN IN THIS OPM SHALL BE SUPPLIED AND INSTALLED BY THE CONTRACTOR.
4. NO COMPONENTS, CABINETS, SHELVES, ETC. SHALL BE SUPPORTED BY OR ATTACHED TO THE HEADWALL UNIT EXCEPT THOSE THAT MEET THE REQUIREMENTS OF THIS OPM & ARE ATTACHED TO THE MANUFACTURER PROVIDED CHANNELS NOTED IN THESE DRAWINGS.
5. ARCHITECTURAL & FIRE LIFE SAFETY CODE COMPLIANCES TO BE REVIEWED AT PROJECT SUBMITTAL. THIS OPM IS FOR STRUCTURAL REVIEW OF SUPPORT AND ATTACHMENT ONLY.



SHEET TITLE: TABLE OF CONTENTS

	CYS STRUCTURAL ENGINEERS, INC.		Job No: 25019
	2710 GATEWAY OAKS DRIVE, SUITE 190N		Date: 07-28-2025
	SACRAMENTO, CA 95833		Page: 1 of 14

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www.cyseng.com

7500 SERIES SEMI-RECESSED FORM/METHOD/H-CORE/RENEW HEADWALL SYSTEM SEMI-RECESSED MOUNT



GENERAL NOTES:

1. THIS HCAI PRE-APPROVAL OF MANUFACTURER'S CERTIFICATION (OPM) IS BASED ON THE CBC 2025. THE DEMAND (DESIGN FORCES) FOR USE WITH THIS OPM MUST BE BASED ON CHAPTER 16A OF THE CBC 2025.
2. IT IS THE RESPONSIBILITY OF THE STRUCTURAL ENGINEER OF RECORD (SEOR) FOR A SITE SPECIFIC PROJECT TO VERIFY:
 - A. THE ADEQUACY OF THE NEW OR (E) STRUCTURE TO RESIST THE FORCES & WT SPECIFIED FOR EA HEADWALL IN ADDITION TO ALL OTHER LOADS. PROVIDE & DESIGN SUPPLEMENTARY MEMBERS AS REQ.
 - B. THAT THE INSTALLATION IS IN CONFORMANCE W/ THE APPLICABLE PORTIONS OF CHAPTERS 16A, 17A, 19A & 22A IN THE CBC 2025 & W/ THE DETAILS SHOWN IN THIS PRE-APPROVAL.
 - C. THAT THE ACTUAL HEADWALL'S WT, CENTER OF GRAVITY (CG) LOCATION, ANCHOR LOCATIONS, ANCHOR DTLs, ATTACHMENT LOCATIONS, ATTACHMENT DETAILS, & THE MATERIAL & GA OF THE HEADWALL WHERE ATTACHMENTS ARE MADE, AGREE W/ THE INFO SHOWN ON THE PRE-APPROVAL DOCUMENTS.
 - D. THAT THE PROJECT SPECIFIC VALUES OF S_{DS} & H_f/R_μ RESULT IN SEISMIC FORCES THAT DO NOT EXCEED THE VALUES PROVIDED IN THE DESIGN CRITERIA.
 - E. THAT THE FLR ANCHORS ARE LOCATED AT AN ADEQUATE DISTANCE FROM ANY SLAB EDGES OR OPGs.
 - F. THAT THE FLR ANCHORS ARE LOCATED AT AN ADEQUATE DISTANCE FROM ANY NEW OR EXISTING ANCHORS. THE SPCG SHOWN IN THE EXPANSION ANCHOR TABLE ON PG 3 IS THE REQ MIN SPCG OF THE GIVEN DIA ANCHORS. THE REQ SPCG FROM ANCHORS OF OTHER DIAMETERS & EMBEDMENTS MAY VARY & SHALL BE EVALUATED BY THE SEOR.
 - G. THAT THE CONC SLAB TO WHICH THE EQUIP IS ANCHORED SHALL MEET THE REQUIREMENTS OF THE APPLICABLE ICC REPORT & THIS OPM.
3. EXPANSION ANCHORS INSTALLED IN NWC OR SLWC SHALL BE CARBON STEEL HILTI KB-TZ2 EXPANSION ANCHORS AS NOTED COMPLYING W/ ESR-4266 MOST RECENT EDITION.
 - A. INSTALLATION: INSTALL THE EXPANSION ANCHORS IN ACCORDANCE W/ THE REQUIREMENTS GIVEN IN THE ICC EVALUATION REPORT FOR THE SPECIFIC ANCHOR & THE PARAMETERS GIVEN IN THE EXPANSION ANCHOR TABLE ON PG 3.
 - B. JOB TESTING: FOR VERIFYING SATISFACTORY INSTALLATION WORKMANSHIP, PERFORM JOBSITE TESTING IN ACCORDANCE W/ THE EXPANSION ANCHOR TABLE PROVIDED IN THIS DOCUMENT. TORQUE TEST 50% OF THE INSTALLED ANCHORS. ALL TESTS SHALL BE CONDUCTED IN THE PRESENCE OF THE SPECIAL INSPECTOR & REPORT OF TEST RESULTS SHALL BE SUBMITTED TO HCAI. IF ANY ANCHOR FAILS THE TEST, TEST ALL ANCHORS. THE TEST SHALL BE PERFORMED 24 HOURS OR MORE AFTER INSTALLATION. TESTING MAY BE DONE PRIOR TO EQUIP INSTALLATION, HOWEVER NUT SHALL BE RETORQUED TO INSTALLATION TORQUE AFTER EQUIPMENT INSTALL. ALSO REFER TO 2025 CBC 1910A.5 "TESTS FOR POST-INSTALLED ANCHORS IN CONCRETE". REPORT OF TEST RESULTS SHALL BE SUBMITTED TO HCAI.
 - C. FAILURE/ACCEPTANCE CRITERIA: THE FOLLOWING CRITERIA APPLY FOR THE ACCEPTANCE OF INSTALLED ANCHORS:
 - TORQUE WRENCH METHOD: THE APPLICABLE TEST TORQUE MUST BE REACHED WITHIN THE FOLLOWING LIMITS:
WEDGE TYPE: ONE-HALF ($\frac{1}{2}$) TURN OF THE NUT.
 - D. AVOID DAMAGING (E) STL REINFORCEMENT IN CONC SLAB WHEN INSTALLING CONC EXPANSION ANCHORS.
 - E. PROVIDE FOR FULL THREAD ENGAGEMENT OF NUT & WASHER.



SHEET TITLE: GENERAL NOTES



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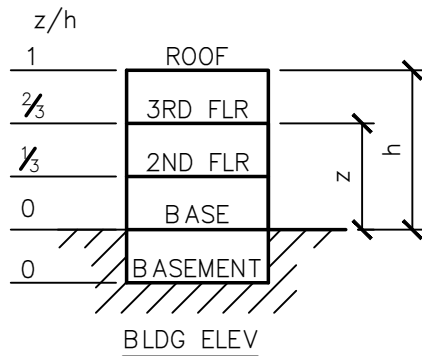
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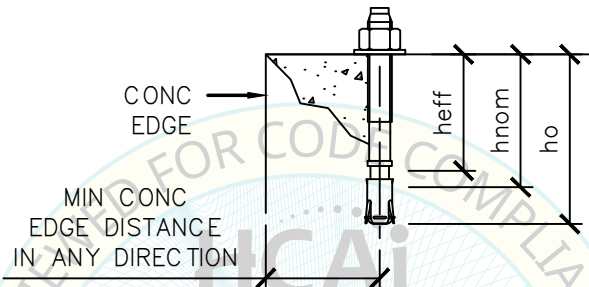
GENERAL NOTES CONTINUED:

4. TWO (2) CASES OF ATTACHMENT ARE SPECIFIED & PRESENTED IN THIS PRE-APPROVAL:



CASE 1: ATTACHMENT DETAILS LOCATED AT UPPER FLRS ABV THE BASE OF A BLDG. THE FLRS ARE ASSUMED TO BE BUILT OF A MIN $3\frac{1}{4}$ " SLWC TOPPING OVER 3" DEEP MIN 20 GA MTL DECK ($f'_c = 3000$ PSI MIN). ANCHORS SHALL BE CARBON STEEL & INTO CONC FILL

CASE 2: ATTACHMENT DETAILS LOCATE AT OR BLW THE BASE OF A BLDG. THE FLRS ARE ASSUMED TO BE BUILT OF A MIN 4" NWC SLAB ($f'_c = 3000$ PSI MIN). ANCHORS SHALL BE CARBON STEEL.



EXPANSION ANCHOR TABLE

CONDITION OF ANCHORAGE	ANCHOR DIA & TYPE (INCH)	INSTALLATION EMBED (INCH) hnom	EFFECTIVE EMBED (INCH) hef	HOLE DEPTH (INCH) ho	MIN CONC THK (INCH) h	MIN CONC EDGE DISTANCE (INCH)	MIN ANCHOR SPCG (INCH)	TEST TORQUE (FT-LBS)
CASE 1	$\frac{3}{8}$ KB-TZ2	2 1/2	2	$2\frac{3}{4}$	$3\frac{1}{4}$	8	8	30
CASE 2	$\frac{3}{8}$ KB-TZ2	2 1/2	2	$2\frac{3}{4}$	4	8	8	30

NOTE:

MIN CONC THK SPECIFIED IS THE CONC THK OVER THE MTL DECK.

5. SHEET METAL SCREWS SHALL BE HILTI SELF-DRILLING SCREWS PER ICC ESR-2196 MOST RECENT EDITION.



SHEET TITLE: GENERAL NOTES CONTINUED

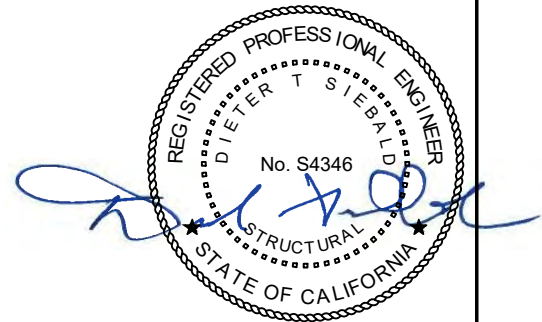
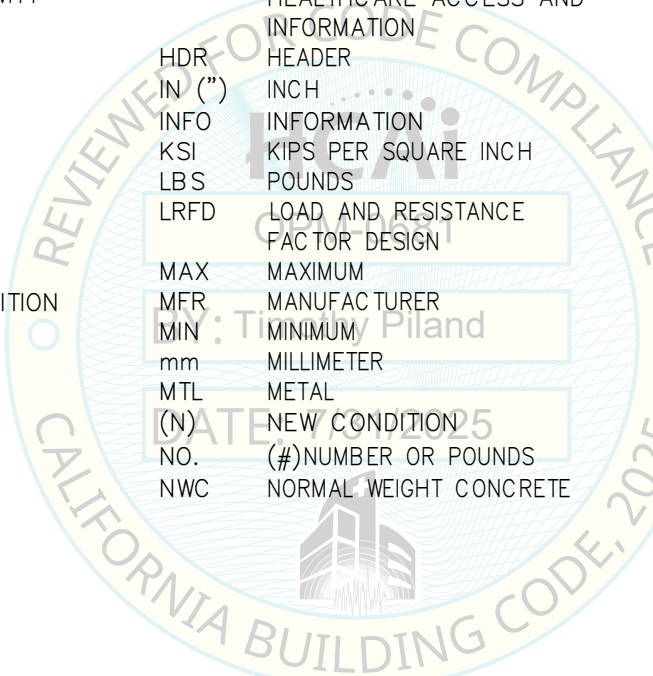
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ABBREVIATIONS:

Ω_o	SEISMIC OVERSTRENGTH FACTOR	f'_c	MINIMUM ULTIMATE COMPRESSIVE STRENGTH OF CONCRETE	OP	OPERATING
AB	ANCHOR BOLT	FLG	FLANGE	OPG	OPENING
ABV	ABOVE	FLR	FLOOR	OPM	HCAI/OSHPD PRE-APPROVAL OF MANUFACTURER'S CERTIFICATION
ADJ	ADJACENT	FT (')	FOOT/FEET	OSHPD	OFFICE OF STATEWIDE HEALTH PLANNING & DEVELOPMENT
ASCE	AMERICAN SOCIETY OF CIVIL ENGINEERS	F_p	HORIZONTAL SEISMIC FORCE PER ASCE 7-22 SEISMIC FORCE REQUIREMENTS	PG(S)	PAGE(S)
ASTM	AMERICAN SOCIETY FOR TESTING & MATERIALS	F_v	VERTICAL SEISMIC FORCE PER ASCE 7-22 SEISMIC FORCE REQUIREMENTS	P_L	PLATE
BLDG	BUILDING	F_y	SPECIFIED MINIMUM YIELD STRESS OF STEEL	PSI	POUNDS PER SQUARE INCH
BLW	BELOW	GA	GAUGE	REQ	REQUIRED
BOTT	BOTTOM	HCAI	CALIFORNIA DEPARTMENT OF HEALTHCARE ACCESS AND INFORMATION	SEOR	STRUCTURAL ENGINEER OF RECORD
BRG	BEARING	HDR	HEADER	SIM	SIMILAR
BYD	BEYOND	IN (")	INCH	SLWC	SAND-LIGHTWEIGHT CONCRETE
CBC	CALIFORNIA BUILDING CODE	INFO	INFORMATION	SMS	SHEET METAL SCREW
CG	CENTER OF GRAVITY	KSI	KIPS PER SQUARE INCH	SPCG	SPACING
CLR	CLEAR	LBS	POUNDS	SS	STAINLESS STEEL
ϕ	CENTERLINE	LRFD	LOAD AND RESISTANCE FACTOR DESIGN	STL	STEEL
CONC	CONCRETE	MAX	MAXIMUM	THK	THICK/THICKNESS
CONN	CONNECTION	MFR	MANUFACTURER	THRD	THREAD/THEADED
COORD	COORDINATE	MIN	MINIMUM	TRAN	TRANSVERSE
DBL	DOUBLE	mm	MILLIMETER	Tu	ANCHORAGE TENSION REACTION DUE TO SEISMIC FORCE
DIA (Ø)	DIAMETER	MTL	METAL	TYP	TYPICAL
DL	DEAD LOAD	(N)	NEW CONDITION	T&B	TOP & BOTTOM
DTL	DETAIL	NO.	(#)NUMBER OR POUNDS	UNO	UNLESS NOTED OTHERWISE
(E)	EXISTING CONDITION	NWC	NORMAL WEIGHT CONCRETE	Vu	ANCHORAGE SHEAR REACTION DUE TO SEISMIC FORCE
EA	EACH			W/	WITH
ELEV	ELEVATION			Wp	OPERATING WEIGHT
EQ	EQUAL			WT	WEIGHT
EQUIP	EQUIPMENT				



SHEET TITLE: ABBREVIATIONS



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DESIGN CRITERIA & SEISMIC DESIGN FORCES (LRFD):

$$C_{PM} = F_p/W_p = 0.4 S_{DS} I_p \left[\frac{H_f}{R\mu} \right] \left[\frac{C_{AR}}{R_{po}} \right] \quad \text{ASCE 7-22 (13.3-1)}$$

$$C_{PM} = F_p/W_p \text{ (MAX)} = 1.6 S_{DS} I_p \quad \text{ASCE 7-22 (13.3-2)}$$

$$C_{PM} = F_p/W_p \text{ (MIN)} = 0.3 S_{DS} I_p \quad \text{ASCE 7-22 (13.3-3)}$$

$$C_{VM} = F_v/W_p = \pm 0.2 S_{DS} I_p \quad \text{ASCE 7-22 (12.4-4a)}$$

$$H_{f_{MIN}} = 1.0 \quad \text{AT OR BELOW GRADE PLANE}$$

$$H_{f_{MAX}} = 1+2.5 (z/h) = 3.50 \quad \text{ABOVE GRADE } z/h = 1.00$$

$$R\mu_{MIN} = 1.0 \quad \text{AT OR BELOW GRADE PLANE}$$

$$R\mu_{MIN} = 1.3 \quad \text{ABOVE GRADE FOR UNSPECIFIED BUILDING SFRS}$$

$$[H_f/R\mu]_{MAX} = 2.692 \quad \text{ABOVE GRADE } z/h = 1.00$$

$$[H_f/R\mu]_{MIN} = 1.00 \quad \text{AT OR BELOW GRADE PLANE}$$

SUPPORT & ATTACHMENT DESIGN IS PER 2025 CBC AT LRFD LEVEL FORCES PER TABLE 13.6-1 OF ASCE 7-22. OTHER RIGID COMPONENTS PER TABLE 13.5-1 OF ASCE 7-22 INCL SUPPLEMENT #1 & ERRATA:

$$C_{AR} = 1.0$$

$$R_{po} = 1.5$$

$$I_p = 1.5$$

$$\Omega_o = 1.5 \text{ (FOR CONC ANCHORS ONLY)}$$

$$W_p = \text{AS NOTED ON DRAWINGS}$$

THEREFORE,

$$F_p = 0.4 S_{DS} 1.5 W_p (1.0/1.0)(1.0/1.5) = 0.4 S_{DS} W_p \quad \text{AT OR BELOW GRADE PLANE}$$

$$\text{MIN } F_p = 0.3 S_{DS} 1.5 W_p = 0.45 S_{DS} W_p \quad \text{GOVERNS AT OR BELOW GRADE PLANE}$$

$$F_p = 0.4 S_{DS} 1.5 W_p (3.50/1.3)(1.0/1.5) = 1.077 S_{DS} W_p \quad \text{AT } z/h = 1.00$$

TABLE 2 (LRFD)

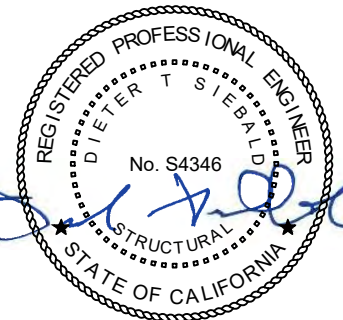
	S_{DS}	$H_f/R\mu$	$C_{PM} = F_p/W_p$	$C_{VM} = F_v/W_p$
CASE 1	2.50	2.692	2.692	0.500
CASE 2	2.50	1.000	1.125	0.500

LOAD COMBINATIONS

- $(1.2 + 0.2 S_{DS}) D + 1.0E$ ASCE 7-22 (2.3.6)
- $(0.9 - 0.2 S_{DS}) D + 1.0E$ ASCE 7-22 (2.3.6)

NOTE:

THIS PRE-APPROVAL MAY BE USED ONLY AT GEOGRAPHICAL LOCATIONS IN THE STATE OF CALIFORNIA WHERE S_{DS} & $H_f/R\mu$ IS LESS THAN OR EQ TO THE VALUES NOTED ABV. SEOR SHALL VERIFY THAT OTHER COMBINATIONS OF S_{DS} & $H_f/R\mu$ MUST RESULT IN A C_{PM} VALUE THAT IS EQ TO OR LESS THAN C_{PM} FORCE FOR CASE UNDER CONSIDERATION.



SHEET TITLE: DESIGN CRITERIA & LOAD COMBINATIONS



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7500 SERIES SEMI-RECESSED FORM/METHOD/H-CORE/RENEW HEADWALL SYSTEM SEMI-RECESSED MOUNT



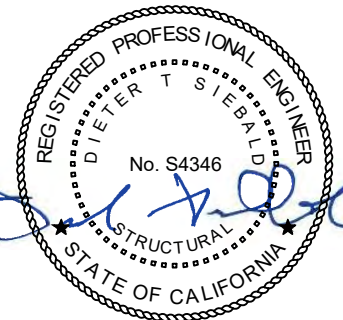
HEADWALL UNIT DIMENSIONS & WEIGHT (LBS)

# OF HEADWALL FRAMES	WIDTH, W (IN)	DEPTH, D (IN)	MAX HEIGHT, H (IN)	MAX WEIGHT, W _p (LBS)	CASE 1 MAX LINEAR LOAD AT HDR (LB/FT)	CASE 2 MAX LINEAR LOAD AT HDR (LB/FT)
1	12" MIN 36" MAX	5.5	130	450	761	351
2	24" MIN 72" MAX	5.5	130	900		
3	36" MIN 108" MAX	5.5	130	1350		
4	48" MIN 144" MAX	5.5	130	1800		

NOTES:

1. THE ABV TABLE PRESENTS THE OPERATING WEIGHTS (W_p) IN POUNDS & INCLUDES THE MAX WT OF ACCESSORIES TO BE MOUNTED ON THE MFR PROVIDED CHANNELS.
2. THE MAX WT SUPPORTED BY EA MONITOR CHANNEL IS 80 LBS.
3. THE MAX WT SUPPORTED BY EA ACCESSORY CHANNEL IS 40 LBS.
4. A HEADWALL UNIT CONSISTS OF MULTIPLE (ONE TO FOUR) HEADWALL FRAMES.
5. EA HEADWALL FRAME IS 12"–36" WIDE.
6. THE MAX LINEAR LOAD TO HDR IS FOR THE WORSE CASE LOADING & IS BASED ON THE MAX WT & MIN WIDTH OF THE HEADWALL FRAME. THESE FORCES ARE PROVIDED TO THE SEOR FOR REFERENCE ONLY. IT IS THE SEOR'S RESPONSIBILITY TO VERIFY THAT ALL SITE-SPECIFIC FORCES ARE ACCOUNTED FOR IN THE DESIGN IF THE HDR & ADJ FRMG USED FOR THE SUPPORT OF THE HEADWALL(S) UNDER CONSIDERATION.

DATE: 7/31/2025



SHEET TITLE: HEADWALL UNIT WEIGHTS



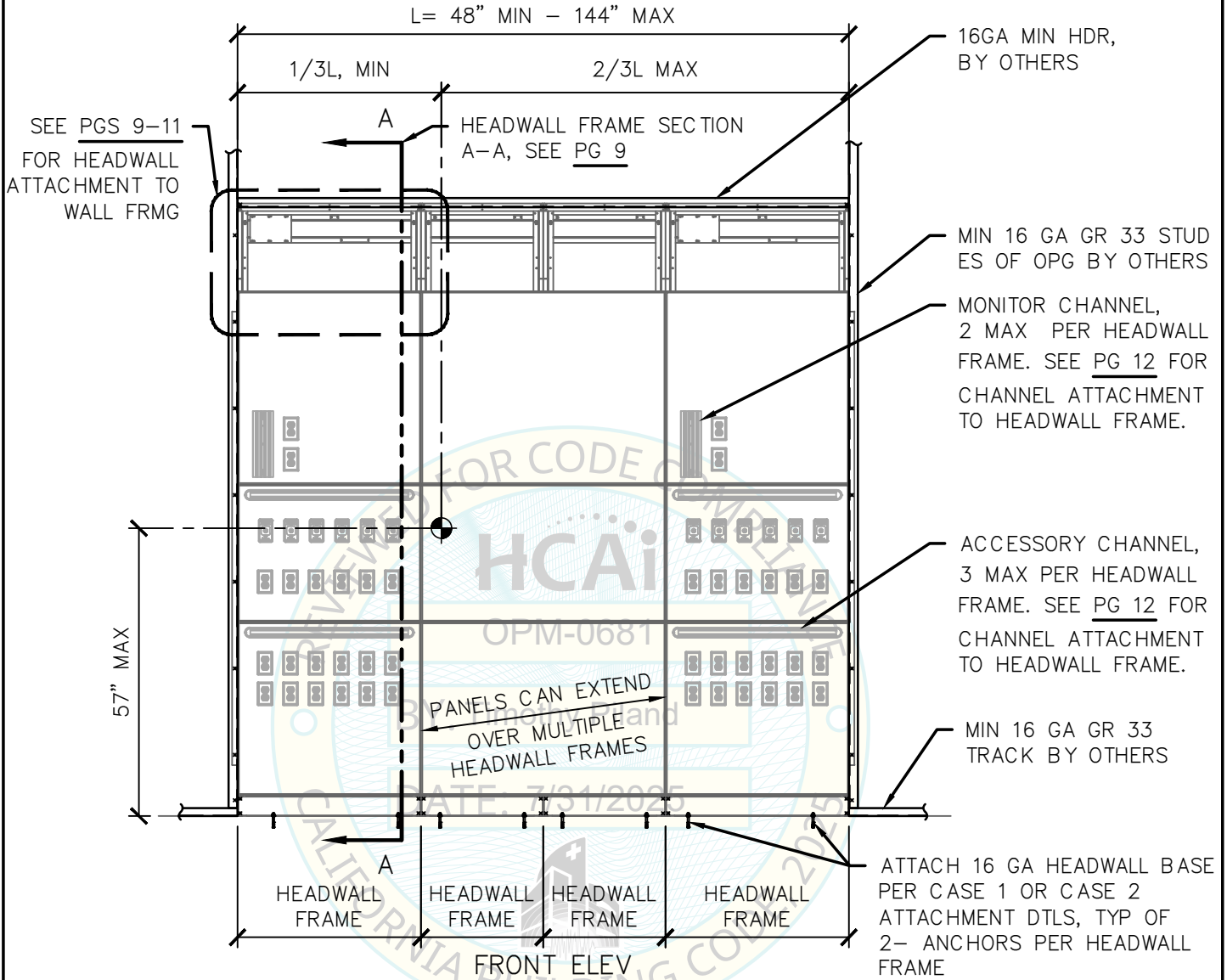
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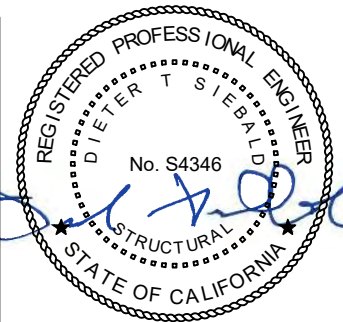
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NOTES:

1. QTY & LOCATION OF MED GAS OUTLETS, ELECTRICAL RECEPTACLES, MONITOR CHANNELS & ACCESSORY CHANNELS MAY VARY. ITEMS SHOWN ON THIS ELEV IS A REPRESENTATION ONLY, UNO.
2. ITEMS MOUNTED TO ACCESSORY CHANNELS ARE MANUFACTURED BY MODULAR SERVICES COMPANY (MSC). ITEMS HAVE INDIVIDUAL LOAD RATINGS OF 25 LBS OR LESS & SHALL HAVE A COMBINED OP WT OF 40 LBS OR LESS PER CHANNEL.
3. ITEMS MOUNTED TO MONITOR CHANNELS ARE BY OTHERS & REQUIRE THEIR OWN MFR'S OPM. ITEMS SHALL HAVE A COMBINED OP WT MOMENT OF 80 FT-LBS OR LESS PER CHANNEL.



**SHEET TITLE: COMPONENT PLANS & ELEVATIONS
MULTIPLE HEADWALL FRAMES**



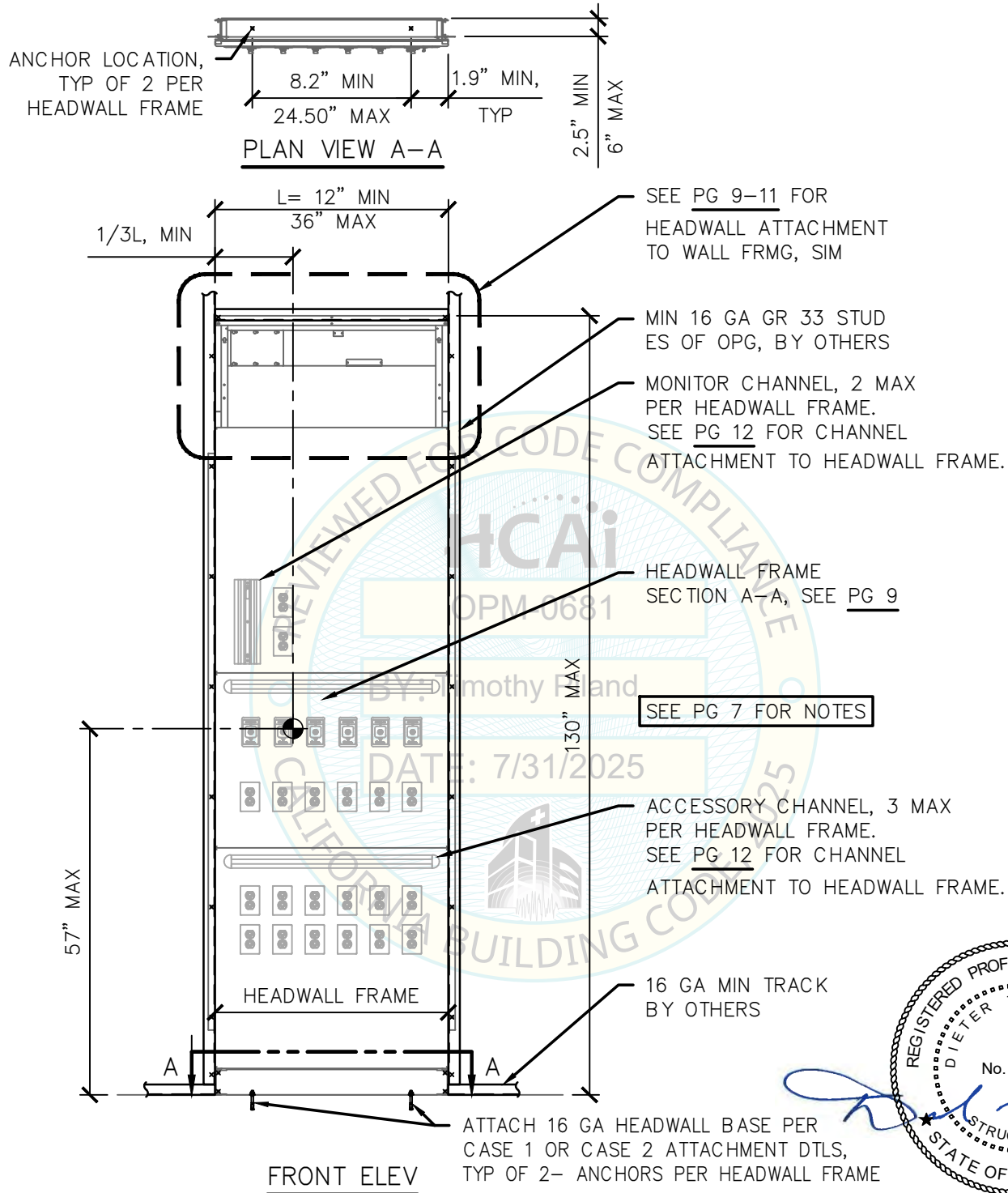
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SHEET TITLE: COMPONENT PLANS & ELEVATIONS
SINGLE HEADWALL FRAME



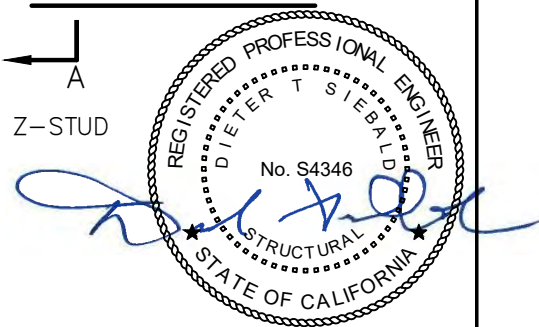
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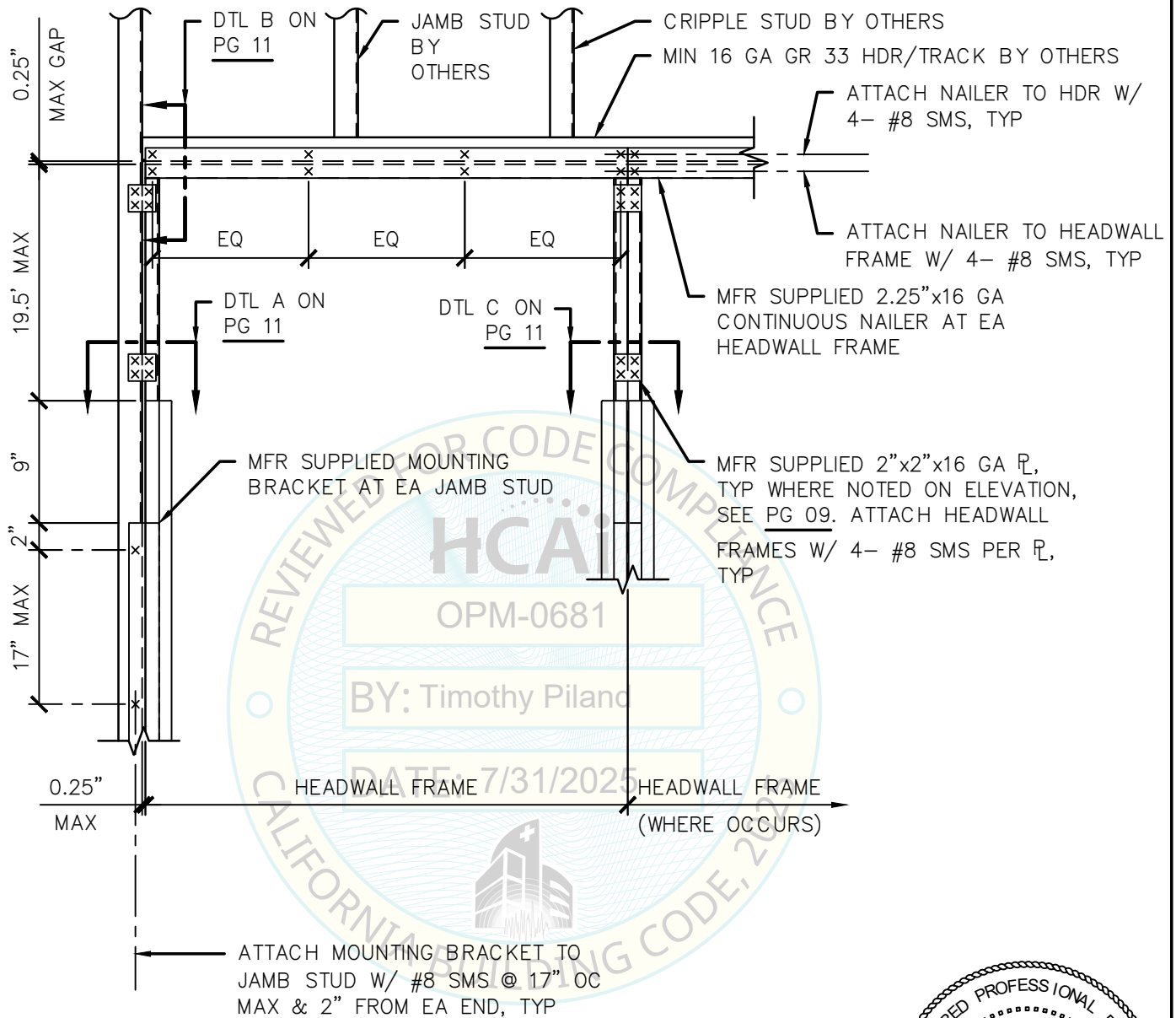
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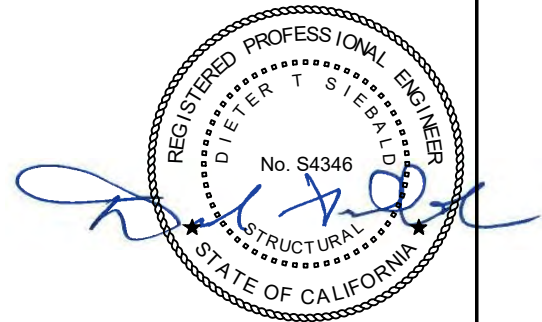
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HEADWALL FRAME & NAILER MATERIAL:
ASTM A653, 16 GA OR 12 GA WHERE NOTED

PARTIAL FRONT FRMG ELEV



SHEET TITLE: HEADWALL FRAME TO STUD
WALL ATTACHMENT DETAILS



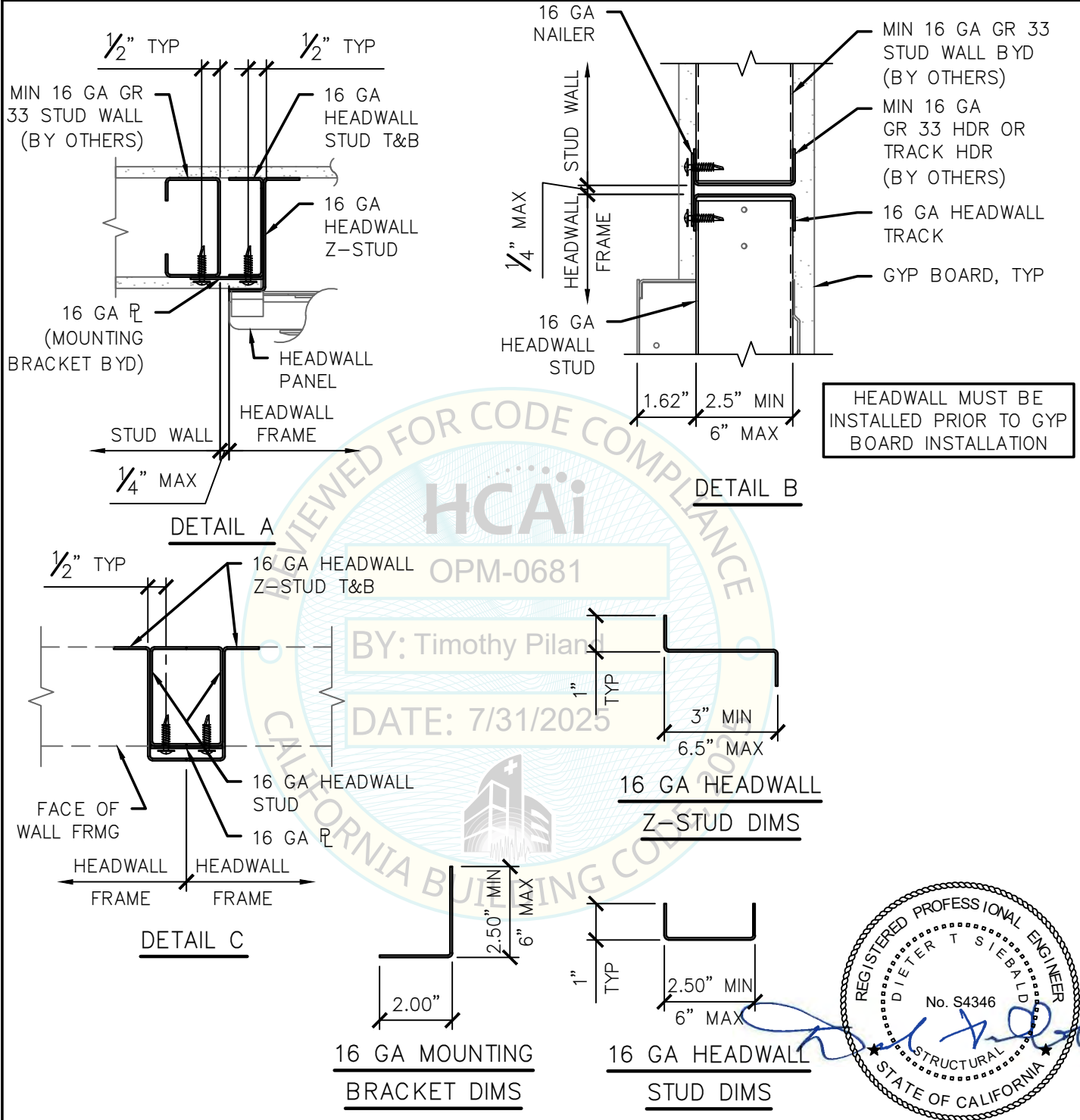
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SHEET TITLE: HEADWALL FRAME TO STUD
WALL ATTACHMENT DETAILS



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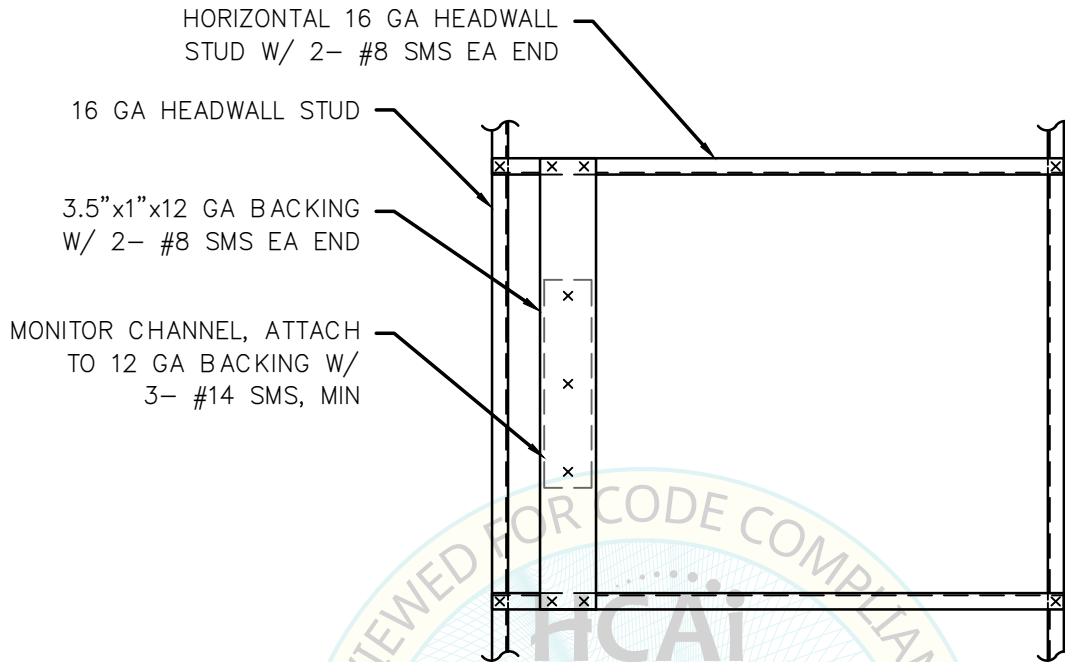
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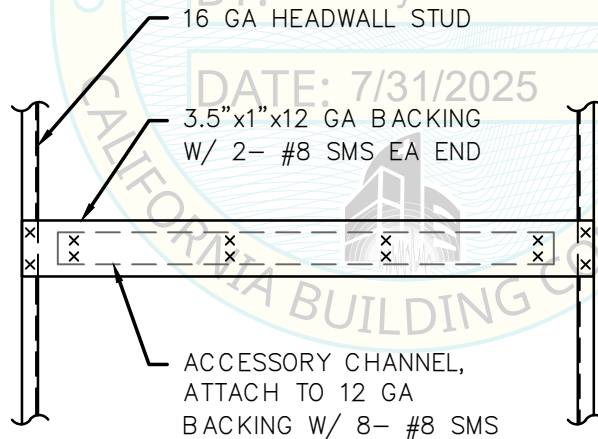
7500 SERIES SEMI-RECESSED FORM/METHOD/H-CORE/RENEW
HEADWALL SYSTEM SEMI-RECESSED MOUNT



MONITOR CHANNEL ATTACHMENT DETAIL



ACCESSORY CHANNEL ATTACHMENT DETAIL



SHEET TITLE: CHANNEL ATTACHMENT DETAILS



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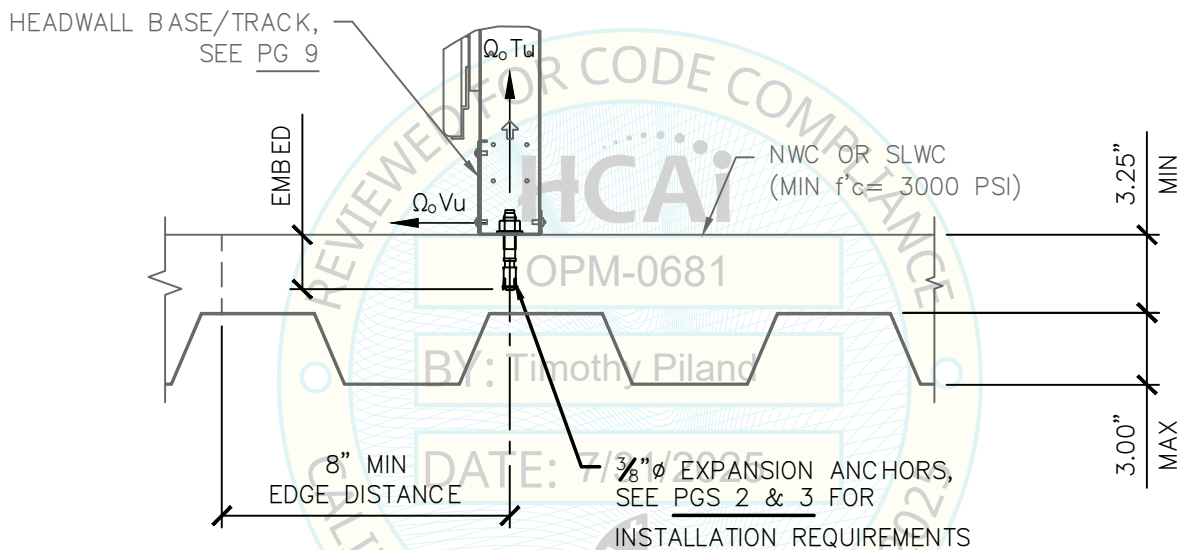
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7500 SERIES SEMI-RECESSED FORM/METHOD/H-CORE/RENEW
HEADWALL SYSTEM SEMI-RECESSED MOUNT



	MAX LRFD FORCES AT EA ANCHOR	
	$\Omega_o T_u$	$\Omega_o V_u$
CASE 1	0	927#

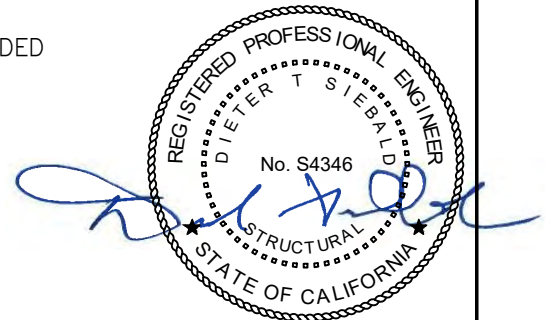
OVERSTRENGTH FACTOR (Ω_o) INCLUDED.



SUSPENDED FLR (CASE 1)

NOTE:

CASE 1 CAN ALSO BE USED IN SUSPENDED
FLOORS WITH A MIN 4" THICK NWC
(MIN f'_c = 3000 PSI)



SHEET TITLE: ATTACHMENT DETAILS

CONCRETE FILL OVER METAL DECK (CASE 1)



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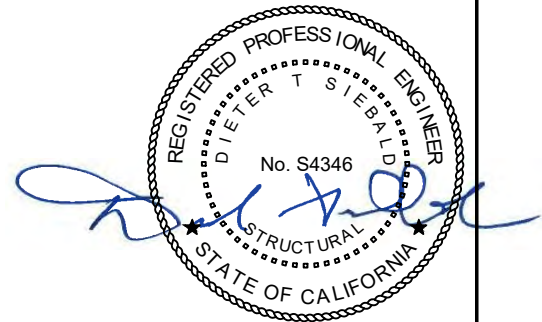
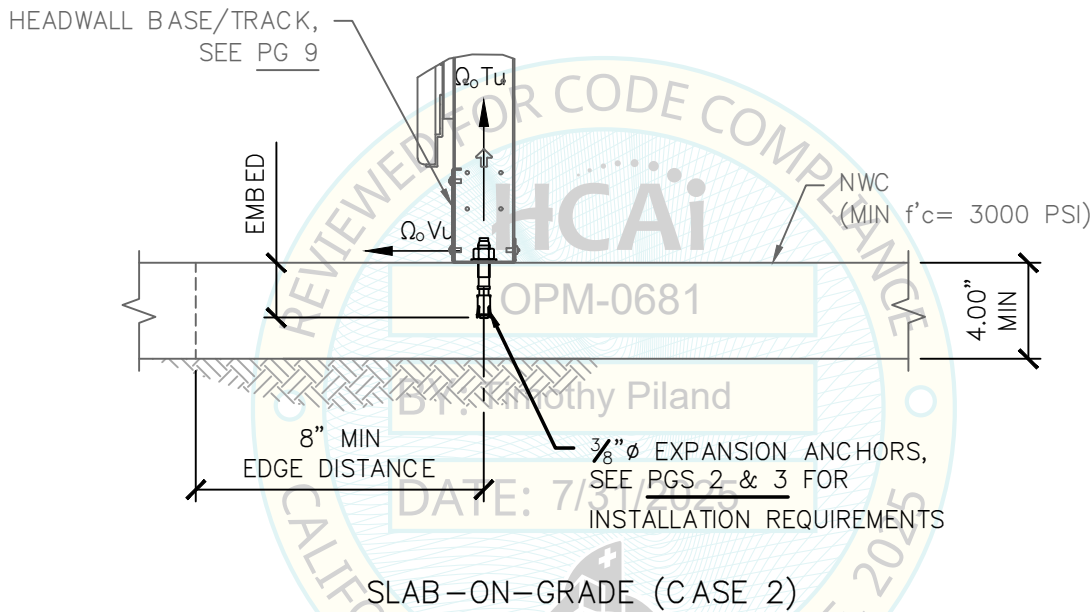
7500 SERIES SEMI-RECESSED FORM/METHOD/H-CORE/RENEW
HEADWALL SYSTEM SEMI-RECESSED MOUNT



MAX LRFD FORCES
AT EA ANCHOR

	$\Omega_o T_u$	$\Omega_o V_u$
CASE 2	0	410#

OVERSTRENGTH FACTOR (Ω_o) INCLUDED.



SHEET TITLE: ATTACHMENT DETAILS
CONCRETE SLAB-ON-GRADE (CASE 2)



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