

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION
OFFICE OF THE STATE FIRE MARSHAL**

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September 7, 2006

Robin Gilb, Staff Counsel
Department of Housing and Community Development
1800 3rd Street, Room 440
Sacramento, CA 95814

Dear Ms. Gilb.,

This letter is in response to the Department of Housing and Community Developments request for comment relating fire hazards associated with the potential expanded use of specific plastic piping in housing; specifically the expanded use of CPVC and PEX for potable water, and ABS/PVC in drain, waste and vent applications. The Office of the State Fire Marshal has concerns with any combustible products integrated in the construction of buildings as well as all other combustible products used or stored. However, while these materials are currently used in the construction of housing, and their expanded use may create additional related fire hazards. The Office of the State Fire Marshal offers the following comments:

1. The expanded use of all types of plastics as well as other building materials and contents and the products of combustion generated by these materials in the fire environment creates a condition within a burning structure of an increasingly toxic environment;
2. That commonly accepted materials and products made from wood and other organic fibers also produce toxic products of combustion hazardous to the health of humans;
3. The development of fire stopping materials and other requirements currently contained in the California Building Standards Codes and provisions proposed for adoption in the 2006 Uniform Plumbing Code, mitigate the fire spread hazard associated with the proposed materials within the structure.
4. The quantity of these materials is relatively insignificant when compared to all the other materials within the building. Therefore, the fire hazard or added toxic products of combustion generated by these materials in a fire would be comparatively minor

The Office of the State Fire Marshal appreciates the efforts of the Department of Housing and Community Development in consulting with us regarding our opinion. Should you have any questions, please contact Kevin Reinertson at (916) 327-4998

Sincerely,

Kevin Reinertson
Senior Deputy State Fire Marshal