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REAL ESTATE  
SERVICES DIVISION

6-02-08

California Department of General Services  
Real Estate Services Division  
Professional Services Branch, Environmental Services Section  
707 Third Street, Third Floor, MS 509  
West Sacramento, CA 95605-9052

Attn: Valerie Namba, Senior Environmental Planner

RE: Comments on Draft Environmental Impact Report on PEX Tubing

My comments on the DEIR are as follows:

I have been installing CROSS-LINKED POLYETHYLENE (PEX) tubing since 1998. During that time, I have installed approximately 4000 residential and 1850 multi family systems. To date we have not had any call backs from end users complaining about taste and odor from their PEX water distribution system (*as is common for copper and galvanized water delivery systems. This is undoubtedly resulting from the use of flux and lead based soldering compounds or pipe sealing compounds used in conjunction with galvanized piping*).

Since we have been installing PEX water distribution systems we have not had any call backs due to premature failures of the system. We have had numerous failures of copper systems over the past 30 years and in areas where copper or galvanized piping is failing, the PEX water distribution system has virtually eliminated any and all call backs. We continue to replace failing copper and galvanized systems with PEX tubing, where approved, with great success and to the satisfaction of the end users.

At Griffin Industries PEX tubing is being installed above slab with one exception, isolated kitchen islands. **In that condition our QA program requires sleeving in 3" ABS.** This eliminates the following Concerns:

- \*Underground damage from other trades*
- \*Any possibility of permeation of contaminated or per-treated soils.*

Since we have been installing PEX tubing, we have not experienced any failures of PEX tubing, connections or fittings of any type, whether installed in a typical water distribution system or in a recirculation system. The California Energy

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Code requires automatic valves on recalculating pumps when hot water is not needed. Additionally our QA protocol specifies the use of only PEX systems that have passed the **NSF P171 protocol**. PEX tubing's high performance capabilities at high operating pressures and temperatures of 160psi at 73F, **100psi at 180F**, and **80psi at 200F** (as noted for SDR 9 tubing in ASTM F876) are responsible for its outstanding dependability.

I can not state the same thing for copper installations. We have replaced numerous copper systems due to pinhole leaks that have occurred in as little as 6 months.

We strongly encourage the adoption of PEX tubing into the California Plumbing Code.

Thank you for your consideration.

Sincerely,



Kim A. Nielsen

Operations

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