STATE OF CALIFORNIA
GOVERNMENT OPERATIONS AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED SEPTEMBER 11, 2015
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 26, 2015 (no later than 5:00 pm)

Date: October 22, 2015

From:

Glenn Gall
Name (Print or type) (Signature)

Office of Statewide Health Planning and Development
Agency, jurisdiction, chapter, company, association, individual, etc.

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I/We ~~(do)~~(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1705A.13.3.1 of Title 24, Part 2, Volume 2

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

Suggested Revisions to the Text of the Regulations:

1705A.13.3.1 [OSHPD 1 & 4] ~~1705A.12.4.1~~ Special seismic certification shall be required for the following systems, equipment, and components:

1. *Emergency and standby power systems.*
2. *Elevator equipment (excluding elevator cabs).*
3. *Components with hazardous contents.*
4. *Exhaust and Smoke control fans.*
5. *Switchgear and Switchboards.*
6. *Motor control centers.*

7. ~~Radiography and/or fluoroscopy systems for trauma and/or diagnostic use in fluoroscopy rooms and radiographic rooms (Rad rooms).~~ Fluoroscopy and x-ray equipment required for radiological/diagnostic imaging service (a minimum of one, see CBC Section 1224.18.1) and any fluoroscopy and/or radiographic system provided in support of diagnostic assessment of trauma injuries.
8. CT (Computerized Tomography) systems ~~for trauma and/or diagnostic use~~ used for diagnostic assessment of trauma injuries.

   Exception: CT equipment used for treatment or in hybrid operating rooms, including those used for interventional CT, unless used for diagnostic assessment of trauma injuries.
9. Air conditioning units excluding Variable/Constant Air Volume (VAV/CAV) boxes up to 75 lbs.
10. Air handling units.
11. Chillers, including associated evaporators, and condensers.
12. Cooling Towers.
13. Transformers.
14. Electrical substations.
15. UPS and batteries.
16. ~~Distribution panels~~ Panelboards as defined in the California Electrical Code (CEC) Article 100.
17. Industrial Control panels as defined in the California Electrical Code (CEC) Article 100.
18. Power isolation and correction systems. -
19. Motorized surgical lighting systems.
20. Motorized operating table systems
21. Internal communication servers and routers.
22. Medical gas and vacuum systems.
23. Electrical busways as defined in UL 857.
24. ~~Components powered by life safety or critical branches in accordance with the California Electrical Code (CEC) Articles 517.32 and 517.33. Fixed equipment powered by those circuits shall require special seismic certification only when identified in items # 1 through # 23 in this section.~~ Electrical control panels powered by the life safety branch in accordance with the California Electrical Code (CEC) Article 517.32, or the critical branch in accordance with CEC Article 517.33.

Exceptions:

1. Equipment and components weighing not more than ~~20~~ 50 lbs. supported directly on structures ~~(and not~~ or surface mounted on ~~other~~ equipment or components~~)~~ that are not required to have special seismic certification by this section. ~~with supports and attachments in accordance with this code.~~
2. Movable (mobile) and temporary equipment/components, which are not anchored to structure or permanently attached to the building utility services such as electricity, gas, or water. For the

purposes of this requirement, "permanently attached" shall include all electrical connections except plugs for duplex receptacles.

3. *Pipes, ducts, conduits, and cable trays, excluding in-line equipment and components.*
4. *Underground tanks.*
5. *Electric motors, ~~and~~ pumps, and compressors up to 20 hp. ~~not more than 10 hp. rigidly supported directly on structures (and not mounted on other equipment or components) with supports and attachments in accordance with this code~~.*
6. *Electrical controllers, switches, transformers, circuit breakers, and fuses up to 10 lbs. or 10 amperes.*
7. *Components where importance factor, I_p, is permitted to be 1.0 by this code.*
8. *Emergency generators up to 25 kilowatts.*
9. *Equipment and Components used for clinical trials only.*

Reason: Based on Criteria 6 the language in Section 1705A as submitted needs clarification and OSHPD is recommending that the above language as amended be approved. OSHPD received a letter from the Medical Imaging & Technology Alliance that also addresses the need for clearer language regarding the seismic certification of fluoroscopy, CT and other imaging equipment.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

(a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

(1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.

(2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.

(3) The public interest requires the adoption of the building standards.

(4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.

(5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.

(6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

(A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.

(B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.

(8) The format of the proposed building standards is consistent with that adopted by the commission.

(9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.