

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 9, 2015
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: NOVEMBER 23, 2015 (no later than 5:00 pm)

Date: 11/22/2015

From: Todd Gottshall

Name (Print or type)



(Signature)

Member UMC Ch. 12 Task Group, Western Allied Mechanical

Agency, jurisdiction, chapter, company, association, individual, etc.

1180 O'brien Drive, Menlo Park, CA 94025

Street

City

State

Zip

tgottshall@westernallied.com

650-326-0750

Email address

Phone number

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

The Agency proposed modifications As Submitted on Section No.

BSC 02/15-10-01

Adoption of UMC 2015 Chapter 12-Hydronics

and request that this section or reference provision be recommended:

Approve Disapprove Further Study Approve as Amended

Suggested Revisions to the Text of the Regulations:

IAPMO's UMC Chapter 12-Hydronics was completely rewritten and will currently violate HSCS Section 18930 Items 4 and 6 below.

UMC 2015 Chapter 12-Hydronics was completely rewritten and includes many errors. These errors are currently being addressed by an IAPMO assembled task group to improve Chapter 12 for the 2018 UMC code cycle. The completely rewritten UMC 2015 Chapter 12 will be followed in three years by another completely rewritten UMC 2018 Chapter 12. Adopting the two new chapters within a period of six years represents a large learning curve for building code officials in terms of enforcement and for engineers and contractors in terms of designing and installing code compliant hydronic systems. There is risk of confusion and the waste of a great deal of money in training and enforcement.

Below are some examples of regulations in the current version of UMC 2015 and a description of the issues they present:

{Continued on the next page}

Reason: [The reason should be concise if the request is for "Disapprove," "Further Study Required," or "Approve As Amended" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

- Inclusion of potable water which is already covered in the UPC
- Inclusion of heating appliance equipment which is already covered in Chapters 9 and 10.
- Inclusion of requirements for how to size and select pumps which are referred to as circulators which is not necessary
- Inclusion of incorrect equations to size expansion tanks
- Requirements for exterior piping to include freeze and UV protection regardless of climate or pipe material
- Requirements for long radius elbows not less than 6x pipe diameters
- Inclusion of requirements for controls and equipment safety that are included the Energy Code and UMC Chapters 9 and 10
- Redundant requirements for balancing, low water controls, backflow prevention, and flow switches that are covered in other chapters
- Incorrect and confusing requirements applying to steam systems
- Overly prescriptive, conflicting, unenforceable, and erroneous requirements regarding radiant heating systems
- Inclusion of electrical system requirements with regard to electric heating panels
- Inclusion of fire safety regulations that are addressed in the building code

It is recommended then that for the 2016 CMC code cycle that the UMC 2012 Chapter 12-Hydronics be adopted in lieu of the UMC 2015 Chapter 12. This will ensure that there is only one new revised chapter for the industry to adopt during the 2020 code cycle and much effort and confusion are avoided in the years in between.

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.