



UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

UA Local Union: 78

1111 W. James M. Wood Blvd
Los Angeles, CA 90066

Subject:

William P. Hite
General President

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Assistant General President

April 7, 2005

Richard Drury
Adams Broadwell Joseph & Cardozo
651 Gateway Blvd., Suite 900
South San Francisco, CA 94080

RE: Issues Related to CPVC Plastic Pipe

Dear Mr. Drury:

I am the Business Manager of UA Plumbers' Local 78, located at 1111 West James M. Wood Blvd., Los Angeles, CA 90015. I have personal knowledge of the matters set forth in this letter from many years of working in the plumbing industry.

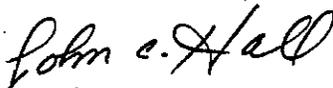
1. I am a licensed Journeyman Plumber in the County of Los Angeles. I spent five years as an apprentice plumber, nine years as a journeyman plumber in the field, and worked as a foreman and general foreman. For nine years I was an apprentice instructor at the Apprentice and Journeyman Training Trust in Dominguez Hills, California. I am a graduate of the Journeyman and Apprentice Instructor Training Program at Ann Arbor, Michigan. I have personally participated in the installation of plumbing systems in well over one thousand single and multi-family residential units.
2. In a large residential development involving partially pre-fabricated units, it is common to install CPVC plastic pipe in as many as 20 housing units per day.
3. It is common to install electrical wiring adjacent to CPVC plastic pipe since the same holes are often used for both plumbing and electrical service. Nothing in the Building Code prohibits placement of electrical wiring adjacent to CPVC plastic pipe, and it saves time and expense to place both services in the same holes.
4. It is common for contractors to use more cement, primer and solvents than suggested by manufacturers' instructions when installing CPVC pipe.
5. Propane gas is the fuel of choice in the installation of copper residential water pipe systems. Acetylene is very rarely used. I estimate that acetylene is used in less than one percent of residential copper plumbing installations.
6. A typical fourteen-ounce canister of propane gas is sufficient to plumb two to three typical residential homes with copper pipe.
7. Less than one percent of propane gas is vented to the atmosphere during the installation of copper drinking water pipe systems. Modern propane torches have electronic ignition triggers that light the propane almost immediately, resulting in almost no discharge of unburned propane to the atmosphere. Older propane torches

are ignited with a hand-held striker that is used to ignite the propane almost immediately after turning on the propane flow. Even with the older units, plumbers release very little unburned propane into the atmosphere prior to lighting since this would constitute waste of a valuable product. I estimate that less than one percent of propane is vented to the atmosphere prior to combustion even with the older hand-lit propane torches.

11. Plumbers are trained not to overheat flux, as this can ruin a joint. Plumbers are trained to use just enough heat to melt the flux and solder.
12. Construction activity varies month-by-month due largely to rainfall. Most residential construction is halted during rainfall. Since most rainfall in California occurs during the winter, this results in a decrease in construction activity during the winter months. There is generally a 25-30% decrease in construction activity during the winter months.
13. Plumbers typically work five days per week and typically do not work on federal holidays.
14. I have reviewed calculations prepared by Mr. Nick Kavanaugh, former Training Director, Joint Apprenticeship and Training Committee, Pipe Trades Training School, PMCA, Kern, Inyo and Mono Counties (Aug. 19, 1998). Mr. Kavanaugh calculated the number of joints required for a typical residential home plumbed with CPVC. I conclude that Mr. Kavanaugh's calculations are still reasonable and accurate. Also, the size of the average new home continues to expand in California, with additional bathrooms, kitchen sinks and other amenities becoming increasingly common. Therefore, Mr. Kavanaugh's calculations may underestimate the number of joints required for a typical home today.

Thank you. Feel free to contact me with any questions.

Sincerely,



John Hall
Business Manager
UA Local 78

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