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California Building Standards Commission
2525 Natomas Park Drive Ste. 130
Sacramento, CA 95833

Att: Dave Walls

Re: Limits of plastic DWV pipe in hospitals

I have been in the plumbing industry for 40 years and started contracting in 1975. My comments are limited to the use of PVC/ABS products. Other high-end plastics are used for special applications, but are not made from PVC.

Reading the proposed code changes to allow plastic DWV & RWL in hospitals for the 2011 code cycle gives me numerous concerns. I will attach the files that support my statements and would welcome any questions after your review.

Plastic DWV & RWL have many limitations when installed below and above ground. Below ground earth load and temperature limits are listed in the 3 files attached: 2321.pdf, Plastic underground.pdf & Charlotte PVC Limits.doc. The installation steps for plastic vs. cast iron have 4 times more steps resulting in more enforcement time from Inspectors.

Above ground limits are outlined in 4 files: Plastic aboveground, Firestop.pdf, 3M CP 25 WB.pdf, PVC in Buildings.pdf & Rectorseal 1000. pdf. The list is long as numerous issues will now increase costs to install correctly. The fact that firestop materials have no useful lifespan should be your largest concern. Air testing plastic is not allowed [712 Media Test CPC], so testing above critical areas with water could create damage if leaks occur during installation.

Combustible piping that has a history of dangers should not be considered in the highest degree of safety that a hospital provides the citizens of California.

Sincerely,

Ira W Schumer

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