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June 17, 2008

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

JUN 20 2008
REAL ESTATE
SERVICES DIVISION

RE: DEIR (Draft Environmental Impact Report) for PEX Tubing

Dear Valerie,

CALPASC is a non-profit trade association of specialty contractors, their suppliers, and other affiliated members. We have 525 member companies in California, who employ approximately 75,000 construction personnel.

CALPASC has conducted a survey of our Plumbing Contractor members regarding the use of PEX. The findings are as follows:

1. The average number of years in business of the respondents is 18.
2. The average number of years these companies have been installing PEX tubing systems is 7.
3. The respondents have installed PEX tubing systems in 26,950 housing units in California.
4. There have been no premature failures in the PEX tubing system.
5. There have been no odor or taste claims from homeowners for these installations.
6. There have been 120 problems with a certain fitting that was used early on. Since changing to a different type of fitting, there have been no other leak claims. There have been no permeation claims from these installations.

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Additional commentary from respondents is as follows:

A great benefit of PEX systems over copper tubing is that you find potential leaks when the system is pressure tested during construction. This means having virtually no leaks develop after the homeowner takes possession. Every respondent reports installing PEX systems above ground, except for kitchen islands, which have specialized procedures to protect the tubing. The difference in claims experience between PEX tubing systems and copper systems is enormous. Leakage claims continue for copper systems, as well as leaching claims. One member used the term phenomenal as the measure of improvement between PEX systems when compared to copper tubing systems.

CALPASC sincerely appreciates all of the work and effort that have gone into preparing the DEIR. CALPASC strongly supports PEX systems being approved as rapidly as possible for the foregoing reasons

Sincerely,

Marc Kaplan, President of Aspen Insurance, CALPASC (California Professional Association of Specialty Contractors) Member, and Insurer of Many Plumbing Contractors

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