

# OSBORNE COMPANY-LODI

812 Virginia Ave, Lodi, Ca 95242

June 13, 2008

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Calif. Dept of General Services  
Real Estate Service Division  
Professional Services Branch  
Environmental Services Section  
Attn: Valerie Namba

REAL ESTATE  
SERVICES DIVISION

Dear Ms Namba:

I wish to comment on the draft EIR prepared for the purpose of PEX tubing being reviewed for the Calif. Plumbing Code . Specifically, I believed you've overstated the potential effects of chlorine degradation in hot water recirculation.

The Osborne Company is the manufacturers Representative for Grundfos pumps in N.Calif. and N. Nevada. This is that area north of Kern County to Oregon. In its home area, N. Calif., Grundfos commands a 85-90% market share for hot water circulators in new home construction. We sold 11,000 pumps last year. Though this sounds like a sizeable number, this pales in comparison with the actual number of single family homes built in this area. Note, that this also includes the Reno area of N. Nevada where recirculation pumps are mandated as a water conservation measure.

In 2007 sales, less than 5% of the pumps sold did not also have either a timer or aquastat installed with it. We suggest that most of those were sold as replacements for older, worn out pumps. Though the California Energy Code Title 24 requirements do not outlaw constant hot water recirculation in potable water systems, they seriously discourage it. Title 24 sees constant recirculation as a needless energy draw. They place economic constraints on it installations.

In Nevada, where both PEX and hot water recirculation have been code for almost 10 years, there have been no known failures due to chlorine issues.

Sincerely,



Jim Casey  
Area Manager-Osborne/Lodi