



June 3, 2008

Valerie Namba, Senior Environmental Planner
California Department of General Services
Real Estate Services Division
Professional Services Branch, Environmental Services Section
707 Third Street, Third Floor, MS509
West Sacramento, CA 95605-9052

RE: Comments on Draft Environmental Impact Report on PEX Tubing

Dear Ms. Namba:

Herein are my comments on the Draft Environmental Report on PEX Tubing. We have been installing Uponor Wirsbo/Vanguard AquaPEX tubing since 1993. During that time, we have installed approximately 35,000 systems and have not had any call backs from end users complaining about taste and/or odor from their PEX water distribution system. Additionally, in our experience installing PEX water distribution systems call backs due to premature failures of the system are nil. However, we have had numerous failures of copper systems over the past 20 years and in areas where PEX tubing replaces failing copper, the PEX water distribution system has virtually eliminated further call backs. We continue to replace failing copper systems with PEX tubing, where approved, with great success and to the satisfaction of end users.

Most PEX tubing applications are being installed above slab, removing the concern of permeation of contaminated soils. The exception is the installation of PEX tubing to island sinks. Since island sinks are in the interior of the slab, the tubing is virtually protected from coming into contact with harmful contaminants that are applied after the structure is built. In these applications, we have not experienced any call backs concerning permeation of any chemicals into the potable water system.

Whether installed in a typical water distribution system or in a recirculation system, our experience using PEX tubing has proven to be failure free. Not so with copper systems which we have replaced in as little as 12 months due to pinhole leaks.

We strongly encourage the adoption of PEX tubing into the California Plumbing Code.

Sincerely,

Tobin T. Whitt
Chief Executive Officer