

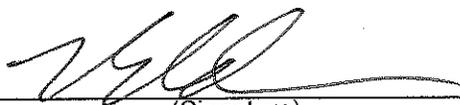
STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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SACRAMENTO, CA 95833
(916) 263-0916 Phone
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 24, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 8, 2012

Date: October 4, 2012

From: Bob Adler 
Name (Print or type) (Signature)

City of San Jose
Agency, jurisdiction, chapter, company, association, individual, etc.

801 N. First St. Rm 200 San Jose CA 95110
Street City State Zip

I/We (do)(do not) agree with:

The Agency proposed modifications As Submitted on Section No. 204.0, 206.0, 224.0, 908.2, 908.2.1, 908.2.1.1, 908.2.1.2, 908.2.1.3, 908.2.1.4, and 908.2.1.5

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

204.0 Bathroom Group – ~~A group of fixtures consisting of a~~ Any combination of fixtures, not to exceed one water closet, one or two lavatories, and either a one bathtub, a or one combination bath/shower, or and a one shower, and may include a urinal or bidet and an emergency floor drain.

Bathroom – A room equipped with a shower, bathtub, or combination bath/shower.

206.0 Dry Vent – A vent that does not receive the discharge of any sewage or waste.

224.0 Vent Pipe – See Plumbing Vent; Dry Vent; Wet Vent.

908.2 Horizontal Wet Venting for a Bathroom Groups.

908.2.1 Where Permitted. A bathroom group located on the same floor level shall be permitted to be vented by a horizontal wet vent where all of the conditions of Section 908.2.1.1 through Section 908.2.1.5 are met. Water closets, bathtubs, showers and floor drains within one or two bathroom groups located on the same floor level and for private use shall be permitted to be vented by a wet vent. The wet vent shall be considered the vent for the fixtures and shall extend from the connection of the dry vent along the direction of the flow in the drain pipe to the most downstream fixture drain or trap arm connection to the horizontal branch drain. Each wet-vented fixture drain or trap arm shall connect independently to the wet-vented horizontal branch drain. Each individual fixture drain or trap arm shall connect horizontally to the wet-vented horizontal branch drain or shall be provided with a dry vent. The trap to vent distance shall be in accordance with Table 1002.2. Only the fixtures within the bathroom groups shall connect to the wet-vented horizontal branch drain. The water closet fixture drain or trap arm connection to the wet vent shall be downstream of any fixture drain or trap arm connections. Additional fixtures shall discharge downstream of the wet vent system and be conventionally vented.

908.2.1.1 Vent Connection. The dry vent connection to the wet vent shall be an individual vent or common vent for the lavatory, urinal, for the bidet, shower, or bathtub. One or two vented lavatory(s) shall be permitted to serve as a wet vent for a bathroom group. Only one wet-vented fixture drain or trap arm shall discharge upstream of the dry-vented fixture drain connection. All dry vent connections to the horizontal wet vent shall be in accordance with Section 905.2 and Section 905.3.

908.2.2.1.2 Size. The wet vent shall be sized based on the fixture unit discharge into the wet vent. The wet vent shall be not less than 2 inches (50 mm) in diameter for 4 drainage fixture units (dfu) or less, and not less than 3 inches (80 mm) in diameter for 5 dfu or more. The dry vent shall be sized in accordance with Table 702.1 and Table 703.2 based on the total fixtures units discharging into the wet vent.

908.2.1.3 Trap Arm. The length of the trap arm shall not exceed the limits in Table 1002.2. The trap size shall be in accordance with Section 1003.3. The vent pipe opening from the horizontal wet vent, except for water closets and similar fixtures, shall not be below the weir of the trap.

908.2.1.4 Water Closet. The water closet fixture drain or trap arm connection to the wet vent shall be downstream of all fixture drain or trap arm connections to the horizontal wet vent.

908.2.1.5 Additional Fixtures. Additional fixtures shall discharge downstream of the wet vent system and be conventionally vented. Only the fixtures within the bathroom group shall connect to the wet-vented horizontal branch.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Because of the public concern that the current code language is confusing as to the meaning, application and enforcement of horizontal wet venting, increasing the liability of unsafe installations where the trap seal of fixtures may be unduly compromised, IAPMO has issued Tentative Interim Amendment UPC-001-12 effective September 10, 2012 . The proposed changes create sub-sections to better simplify the major components of the wet vent system. The new Subsections 908.2.1.3, 908.2.1.4, and 908.2.1.5 contain language current in Section 908.2.1 but have been moved from a single paragraph that is the cause of confusion to subsections for better clarity. IAPMO based issuance of UPC-001-12 upon the following Technical Substantiation:

1. The current code language has overlooked the consequence of allowing the option of the dry vent connection to the wet vent on fixtures other than the lavatory. This would allow an unvented lavatory to connect independently to the wet vented horizontal branch as long as the distance of the lavatory trap arm to the wet vented horizontal branch is in accordance with Table 1002.2. This would allow the lavatory trap arm to form an S-trap, which is in conflict with Section 1004.1 that prohibits S-traps.
2. Because of the allowance mentioned above that has overlooked the prohibition of an S-trap that would be formed by an unvented lavatory trap arm, there is the potential of a health risk in the event that the S-trap is subject to self-siphon, allowing sewer gas to enter the living space.
3. The proposed revision removes the conflict with the other code section by adding provisions in Section 908.2.1.3 that comply with Section 1002.4 to prevent any trap arm from forming an S-trap. With this provision, the lavatory(s) may serve as the wet vent, or shall be individually vented when not serving as the wet vent.
4. The revision has removed the health risk by further adding a factor of safety to prevent siphonage or self-siphonage of fixtures by limiting the number of bathroom groups to one on a horizontal wet vent, and by limiting the number of fixtures allowed on a horizontal wet vent. Therefore, the committee revised the definition of bathroom group to reflect this factor of safety.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.