

From: Chris Hopkins [mailto:chrishopkins@hughes.net]
Sent: Sunday, September 20, 2009 9:09 AM
To: CBSC (General Mail)
Subject: PVC and ABS in California Hospitals

OSHPOD is currently proposing the removal of the ban on ABS and PVC pipe in hospitals. What could possibly prompt such a reduction in the value of Class A Buildings?

Environmentally - PVC and ABS are required to be manufactured from virgin resins and recycled materials are not allowed. PVC resins utilize natural gas, ABS resins utilize petroleum. These products could replace cast iron that is manufactured from 100% recycled materials. Since PVC and ABS are not recyclable, these products after their useful life or scrap generated during construction will find it's way into California landfills. Cast iron will be recycled into other cast iron products and because it has value it will not be disposed of in landfills.

Safety - Plastics, both PVC and ABS are combustible, creating danger in fires. Cast iron does not burn. Plastics because they are combustible require additional installation expense in order to prevent the spread of fire. In some cases, plastics are not allowed at all such as in plenums because of the dangers of toxic fumes should a fire occur.

Reliability - Plastics, ABS and PVC, cannot be installed in locations where the discharge of water or wastewater over 140° F can occur. Since commercial dishwashers discharge at temperatures greater than 140° F, these products cannot be safely installed in food preparation areas.

Comfort - Plastic Pipe is noisy. Cast Iron Pipe is quiet. Water discharging and draining into plastic pipe is easily heard and distracting. It is difficult to hear water discharging or draining in cast iron pipe. People in hospitals need their rest and no noise.

Please carefully consider this move. California should be proud of our infrastructure and not build second rate buildings for cost sake. I recently heard that Hilton Hotels have had experience with PVC and ABS pipe and have banned it in all future properties. Why?

Thanks,

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