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October 8, 2009

California Building Standards Commission
Dave Walls, Executive Director
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Adoption of the 2009 Uniform Plumbing Code (UPC), for the use on the California Code of Regulations (CCR), Title 24, part 5

Dear Mr. Walls,

I am opposed to the removal of the restrictions on the use of CPVC, PVC, and ABS by OSHPD based on the following reasons:

CPVC, PVC and ABS are required to be manufactured from virgin resins which is in conflict with the Green Building concept that encourages sustainable practices and works toward enhancing the design and construction resulting in a positive long-term environmental impact. CPVC, PVC, and ABS resins are manufactured utilizing petroleum and gas products.

Since CPVC, PVC, and ABS products are not recyclable, once removed after their useful life and the scraps from construction, will end-up in California's landfills. These products could replace copper, copper alloys, and cast iron that is manufactured from 100% recycled materials. Copper, copper alloys, and cast iron will be recycled into other products and because it has value it will not be disposed of in landfills.

CPVC, PVC, and ABS are combustible, creating danger in fires. 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. Copper, copper alloy, and cast iron do not burn they melt and do not emit any products that maybe harmful.

ABS and PVC cannot be installed in locations where the discharge of water or wastewater is over 140° F. Boilers, water heaters, dishwashers, sterilizers, and autoclaves, discharge temperatures are greater than 140° F. Discharge temperatures do not affect copper, copper alloys, and cast iron products.

CPVC, PVC, and ABS expand and contract with temperature changes requiring the use of expansion joints. Copper, copper alloys, and cast iron products are not affected by temperatures and do not expand and contract significantly and expansion joints are not required.

Removing these limitations by OSHPD implies that these products are safe to install in buildings that are designed to be safe and protect the public.

Thank you,

A handwritten signature in black ink, appearing to read "Pennie L. Feehan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Pennie L. Feehan