

9-21-2009

To: California Building Standards Commission

Dear Sirs,

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.

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.

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.

Plastics, ABS and PVC, expand and contract with temperature changes requiring the use of expansion joints. Because cast iron does not expand and contract significantly, no expansion joints are needed.

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.

It is important that you ask your reps, your employees, your customers, and others to object to this removal of restrictions. I live in Tennessee where restrictions do not exist on the use of plastics. Despite this fact, I have never seen a hospital use ABS or PVC pipes and fittings for all of the above reasons. Since California has restricted the use of ABS and PVC for decades, it is logical to assume there was some change in the product to make it safe to justify this change. With the removal of the restrictions by the very agency intended to protect the public, it is logical for California engineers and contractors to assume someone who knows best has determined that PVC and ABS are suitable for hospital construction.

Thank you. Richard Christman 33921 alcazar dr. Dana Point, Ca. 92629