

From: Morrison, Tom
Sent: Monday, October 12, 2009 3:19 PM
To: Taylor, Jane
Subject: FW: Greywater standards

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Comment

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From: Douglas Kirk [mailto:doug@greenplumbersusa.com]
Sent: Monday, October 12, 2009 2:28 PM
To: CBSC (General Mail)
Cc: Harry Moos
Subject: Greywater standards

To whom it may concern,

From email:

FINDING OF NECESSITY FOR THE PUBLIC'S HEALTH, SAFETY, OR WELFARE

HCD has made an assessment of the proposal regarding the economic impact of recordkeeping and reporting requirements and has determined that a report pursuant to Government Code Section 11346.3(c) is not required.

MY COMMENT:

After having a bit of time to think about the changes that will be allowed with these amendments to the CPC, and having a through understanding of the CPC, I find the potential to violate sections 901.1 and 904.1 (which address the purpose and sizing of venting systems) extreme.

When allowed to alter an existing DWV system, and divert the discharge (and connected vent pipe) from a single fixture that has been connected to the DWV system, including the vent pipe that serves the fixture, building drain and sewer piping is required so that "air circulation may be ensured throughout all parts of the system", an improperly vented system may result.

There is also the potential for a novice to leave the abandoned vertical or horizontal branch drain uncapped, resulting in an unsafe and potentially hazardous condition.

While a permit may not be required, I strongly advise that an isometric DWV drawing of the proposed changes, be submitted and approved by the AHJ, prior to the commencement of any proposed grayater piping. And that a copy of such drawing shall be kept on file at the Building Department having jurisdiction. Such drawing shall be adequately labeled, showing pips size and cross-sectional areas of DWV piping.

This would require record-keeping and perhaps some reporting which are currently overlooked.

From email:

NOTE: To be notified of any modifications, you must submit written and/or oral comments or request that you be notified of any modifications.

Please do so for me.

Regards,

Doug Kirk, Instructor, Director of Course Materials
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