

## DOCKETED

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<b>Project Title:</b>	Residential Lavatory Faucets and Showerheads
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*Comment Received From: Matt Sigler*

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## **Residential Lavatory Faucets**

Refer to attached comment letter and WRF Project Report #4383

*Additional submitted attachment is included below.*



March 30, 2015

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California Energy Commission  
Docket Number 15-AAER-1  
Docket Unit  
1516 Ninth Street, Mail Station 4  
Sacramento, CA 95814-5504

**RE: DOCKET NO. 15-AAER-1, APPLIANCE EFFICIENCY RULEMAKING FOR TOLIETS, URINALS, FAUCETS,  
HVAC AIR FILTERS, FLUORESCENT DIMMING BALLASTS, AND HEAT PUMP WATER CHILLING PACKAGES**

Dear Commissioners:

Plumbing Manufacturers International (PMI) appreciates this opportunity to provide comments to the California Energy Commission (CEC) under Docket No. 15-AAER-1. PMI is an international, U.S.-based trade association representing 90% of U. S. plumbing products sold in the United States. It has made the promotion of water efficiency and safety a top priority and has included it in its mission statement<sup>1</sup>. PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported water efficiency legislation and codes in California, as well as the voluntary US EPA WaterSense program.

PMI would like to point out to the CEC that recognized public health experts Dr. Marc Edwards and Dr. Paul Sturman have submitted public comments during the rulemaking process expressing their concerns in regards to mandating a 1.0 gpm maximum flow rate for residential lavatory faucets. Adoption of such a standard would require plumbing manufacturers to supply products to Californians that may not be safe in all circumstances, and present a possible liability issue for plumbing manufacturers as well. It is critical that the preservation of public health be confirmed prior to a standard being adopted in the State of California; especially one that is more stringent than industry standards such as CALGreen and EPA WaterSense. Please refer to the excerpts from the Water Research Foundation Report #4383 (DRAFT) titled: "*Green Building Design: Water Quality and Utility Management Considerations*" that Dr. Edwards was a contributor:

- *As more water conservation-specific devices enter the market, despite being NSF/ANSI certified for different health criteria, similar concerns are likely to arise. Fundamental research will be necessary to understand and resolve these problems before such devices can be used with confidence. Results/Conclusions, pg. xxv*

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<sup>1</sup>[PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.](#)

- *Opportunistic premise plumbing pathogens (OPPPs) are now the leading cause of waterborne disease in developed countries (CDC, 2011). Section 3.2.1, pg. 11*
- *The effects of continuous versus intermittent flow, regardless of overall water age, and the effects of high versus low flow rate are unclear. Section 3.6.1.4, pg. 49*
- *Adding another layer of complexity, intermittent high and low flow could further alter how microorganisms grow and are released from biofilms. Clearly, studies examining stagnation versus flow, and high versus low flow rate, have shown contradictory results thus far. There is a need for more research in this area to help explain these discrepancies. Section 3.6.1.4, pg. 50*
- *While achieving water conservation is an important and noble goal, for reasons that are not yet clear – perhaps because of lower flow or specific components of these devices, these devices may pose a health concern to some individuals. Section 3.6.2.2, pg. 52*
- *The low flow through water-reducing faucets is linked to low pressure and an increased stagnant volume of water in the pipes leading to the tap. This could provide ideal growth temperatures (35°C) for *Legionella* spp. and *Pseudomonas aeruginosa* (Halabi et al, 2001). The reduced flow and pressure could be incapable of providing enough water volume or turbulence to properly flush and “clean” the faucet (Chaberny and Gastmeier, 2004; Yapicioglu et al, 2011), which has implications for biofilm attachment and release rates that are not well understood. Section 3.6.2.3, pg. 52*

In closing, PMI strongly encourages the Commission to adopt your recommendation for residential lavatory faucets as outlined in Table H-3 of the Proposed Amendments to Appliance Efficiency Regulations, dated February 2015.<sup>2</sup> Furthermore, PMI would like to thank the California Energy Commission for the opportunity to provide comments for the rulemaking being promulgated for Title 20 through Docket No. 15-AAER-1 on appliance efficiency. Our partnership with the regulatory and stakeholder communities in the State of California will continue to promote water efficiency that will produce safe, sanitary, efficient and reliable products.

Sincerely,



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<sup>2</sup> California Energy Commission, Proposed Amendments to Appliance Efficiency Regulations, February 2015, Table H-3, page 22:  
[http://docketpublic.energy.ca.gov/PublicDocuments/15-AAER-01/TN203715\\_20150220T140835\\_Proposed\\_Amendments\\_to\\_Appliance\\_Efficiency\\_Regulations.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-AAER-01/TN203715_20150220T140835_Proposed_Amendments_to_Appliance_Efficiency_Regulations.pdf)