

## DOCKETED

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| <b>Docket Number:</b>   | 15-AAER-05                                   |
| <b>Project Title:</b>   | Residential Lavatory Faucets and Showerheads |
| <b>TN #:</b>            | 205484                                       |
| <b>Document Title:</b>  | Urinal Comments                              |
| <b>Description:</b>     | N/A  |
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| <b>Organization:</b>    | The IAPMO Group/Stephen Lehtonen             |
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*Comment Received From: Stephen Lehtonen*

*Submitted On: 7/24/2015*

*Docket Number: 15-AAER-05*

## **Urinal Comments**

see document

*Additional submitted attachment is included below.*



## International Association of Plumbing and Mechanical Officials

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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: CEC DOCKET No. 15-AAER-1, PROPOSED AMENDMENTS TO APPLIANCE EFFICIENCY REGULATIONS CALIFORNIA CODE OF REGULATIONS, TITLE 20, SECTIONS 1601 THROUGH 1608**

Dear Commissioners:

The International Association of Plumbing and Mechanical Officials (IAPMO) appreciates this opportunity to comment once again to the California Energy Commission (CEC) regarding the current rulemaking on water closets, urinals and faucets under Docket No. 15-AAER-1. IAPMO supports the current proposed CEC staff recommendations as outlined in their most recent analysis, “Staff Analysis for Toilets, Urinals, and Faucets” as they pertain to toilets, residential lavatory faucets, kitchen faucets and public commercial faucets. However, we remain concerned about the provisions pertaining to urinals due to a lack of research and field experience with urinals flushing on 0.125 gallons per flush (gpf).

Our concerns center on the continued efficacy of sanitary building drains. Installation failures caused by struvite build-up in building drains can occur due to insufficient scouring action. Such failures are extremely disruptive to the operation of a building as they result in strong and excessive odors that often necessitate evacuation of areas adjacent to the bathrooms encountering such problems. Clearing drainage lines from struvite blockage problems is considered to be one of the most unpleasant jobs in the plumbing trade. Prior to implementing a requirement for the installation of 0.125 gpf max urinals, IAPMO strongly recommends that research be conducted on both 0.125 gpf urinals and non-water consuming urinals so that the implications regarding the continued efficacy of building drains are better understood. In addition, IAPMO recommends that a survey of existing buildings that employ 0.125 gpf urinals and non-water consuming urinals be conducted to compare the buildup of struvite in the building drains and the fixture stub out (the pipe connecting the fixture to the main building drain) to similar age installations employing higher consumption models.

Alternatively, IAPMO recommends that the maximum flush volume for urinals be set at 0.5 gpf which is consistent with AB 715 (Chapter 499, Statutes of 2007) and CALGreen and the US EPA’s



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WaterSense program. IAPMO is a founding member of the Plumbing Efficiency Research Coalition (PERC). PERC is an ad-hoc coalition of plumbing and water efficiency associations solely focused on conducting research on plumbing related issues that pertain to water efficiency such that unintended consequences of water efficiency can be avoided. PERC is well suited to conduct research on the issue of 0.125 gpf and non water consuming urinals. IAPMO recommends that the Commission work together with PERC on a collaborative research program to determine the impact that these fixtures will have on building drains.

We would gladly welcome convening a dialog with the Commission on such a project, allowing the Commission's regulation to be determined by sound research as opposed to issuing a regulation and hoping for a successful outcome.

Finally, as an accredited consensus standards developing organization IAPMO recommends that the applicable consensus standard be referenced in the Commission's regulation. ASME A112.19.2/CSA B45.1-2013 provides the consensus-based requirements for water closets and urinals. ASME A112.18.1/CSA B125.1-2012 provides the consensus-based requirements for faucets and showerheads.

In closing, IAPMO would like to thank the Commission for their continued consideration of our comments. As a California based association, we fully appreciate the urgent need for immediate and drastic action to address the ongoing and devastating drought ravaging our State. However, poorly considered regulations that can not only result in disruptive and costly repairs in buildings, but also have the potential for the public to question other water efficiency provisions must be avoided. We look forward to working with the Commission proactively to help arrive at regulations that are not only well intended but which are also based on sound research and data.

Sincerely,

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