DOCKETED

Docket Number:	15-AAER-05
Project Title:	Residential Lavatory Faucets and Showerheads
TN #:	205497
Document Title:	Larry Himmelblau Comments: 1605.3 (h) Table H-3 App Efficiency for Faucet Sprayhead
Description:	N/A
Filer:	System
Organization:	Larry Himmelblau
Submitter Role:	Public
Submission Date:	7/24/2015 11:08:17 AM
Docketed Date:	7/24/2015

Comment Received From: Larry Himmelblau
Submitted On: 7/24/2015
Docket Number: 15-AAER-05

1605.3 (h) Table H-3 App Efficiency for Faucet Sprayhead

In the new Appliance Efficiency Regulations for plumbing fittings 1605.3 (h) Table H-3 released today 4-24-15 there may be an error. It states Ã¢â‚¬oe 2 Sprayheads with independently--Ã¢â‚¬ Ã¢â‚¬â€˜controlled orifices and manual
controls. The maximum flow rate of each orifice that manually turns on or off shall not exceed the maximum flow rate

for a lavatory faucet.Ã¢â‚¬
It is not common for a Ã¢â‚¬oesprayheadÃ¢â‚¬ commonly referred to as a Ã¢â‚¬oeSide sprayÃ¢â‚¬ or Ã¢ â‚¬oeVegetable
SprayerÃ¢â‚¬ to be installed in a Lavatory. I do not believe this was the intent of the author and the footnote should be deleted.
If the intent was to apply this text to Kitchen faucets I would think that the Side spray would qualify as a device that is only used on a temporary basis at a higher flow. I would also like to point out that the effectiveness of a Side spray

with only 1.2 gpm may be dramatically reduced. Thus the user would just use the faucet at an equal or greater flowrate thus negating any water savings.
Respectfully
Larry Himmelblau