## California Energy Commission DOCKETED

14-AAER-01

TN 73550

AUG 06 2014

## Issues involving .125 gal urinals being mandated.

38 yrs. as a contractor has allowed me to work on waste pipes serving urinals, mostly older ones having a wide range of flush volume. Often as a repair plumber I am called to jobs where a runaway flush valve is flooding the floor. Why is the fixture flooding the floor?, because uric salts build up in waste lines. Why does this happen where even large volumes of water are allowed? People do not always flush the urinal, as the water crisis continues, more people will be compelled to do such.

Ignorance is the trouble here, where something may occur, it does. My point is there are problems causing drain line carry, and commercial locations are allowed exemptions where toilets have no wash down fixtures up stream. What is good for the toilet is good for the urinal. One possible solution to the problem is to require an automatic water discharge feature on a cyclical basis. Another is to require an up stream fixture with an automatic water discharge feature. My bet is that with out such solution, there will be costly regrets in mandating .128 GPF urinals even where no insurance of enough water wash down is present.

Anyone not familiar with urinal traps and trap arms installed for over one year needs to see the common build up for themselves before concluding opinions on this issue.

Vinegar flushes are one solution, but who is going to insure it happens?

Caveat emptor could be Green word, or is it already, my concerns are flooded floors and liability there from.