Energy - Docket Optical System

From: Ngo, Tuan@Energy
Sent: Monday, October 06, 2014 11:22 AM
To: Energy - Docket Optical System
Subject: FW: CEC Docket No.14-AAER-1, 2012-2013 Appliance Efficiency Rulemaking Water Appliances
Attachments: Impact of reduced water consumption on drainage system.pptx

Categories: Ready to Docket

Hello Raquel,

Can you please docket this e-mail and the attached document to 14-AAER-1, and post it to the web at this link:
http://www.energy.ca.gov/appliances/2014-AAER-01/prerulemaking/comments/index.html

Thanks.

-Tuan-

From: Kevin Wong [mailto:k.wong@cwqa.com]
Sent: Monday, October 06, 2014 11:06 AM
To: Singh, Harinder@Energy; Ngo, Tuan@Energy
Subject: RE: CEC Docket No.14-AAER-1, 2012-2013 Appliance Efficiency Rulemaking Water Appliances

Dear Commissioners,

The Canadian Water Quality Association (CWQA) appreciates the opportunity to provide comments regarding this Rulemaking. We acknowledge that the California Energy Commission was seeking a very detailed Efficiency Proposal; however, much of the information sought is currently non-existent, proprietary in nature, or unfeasible to obtain due to time or cost constraints.

As a result, we have to look to the systems that we have available to support the argument. As you may be aware, plumbing products are currently regulated by the 2010 California Plumbing Code (CPC) and the 2010 California Green Building Standards Code (CalGreen). Both Code's reference a large number of existing standards which provide detailed requirements for the product design, test procedures, performance, and marking and labeling. These standards took significant time to develop and some have existed for decades. Also, they're periodically and systemically reviewed and updated by a diverse matrix of stakeholders working within a consensus standards development process. This process is administered by a standards development organization like ASME with oversight and approval by an accreditation agency such as ANSI.

Based on the proposal, I would like to share with you a presentation I gave to the Canadian Advisory Council on Plumbing. This body brings together certification bodies and testing organizations, industry and federal and provincial regulators to address current issues facing the sector. They meet annually but keep in contact through the year.

One of the key topics this past year was flow rates on fixtures and appliances, namely the lowered flow rates and the effects this will be having on the whole water system. In this case, the sanitary system. My presentation and notes are attached.

Before you make a decision on this, please review the file AND make note of the limited data we have currently on effects of lowered flows on issues like drainline carry, existing infrastructure issues and impacts to the wastewater treatment plant.

As noted above, the consensuses based standards are designed to be as holistic as possible in developing the standards. The Code like the adopted CalGreen, is developed much in the same way. I would urge that both these powerful systems, which work hand in hand in our codes and standards system be considered as we develop future regulations in the water conservation arena.

If you have any questions or concerns, please feel free to contact me at any time.

Sincerely
Kevin

Kevin Wong, CAE | Executive Director
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From: Matt Sigler [mailto:msigler@pmihome.org]
Sent: Monday, October 06, 2014 12:50 PM
To: Kevin Wong
Subject: CEC Public Comments

Kevin-

It was good talking to you as always! To submit comments to California please send to the following:

Harinder Singh harinder.singh@energy.ca.gov and Tuan Ngo Tuan.Ngo@energy.ca.gov
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: CEC Docket No.14-AAER-1, 2012-2013 Appliance Efficiency Rulemaking Water Appliances

Please copy me on what you send so I can follow up with CEC Staff.

Regards,

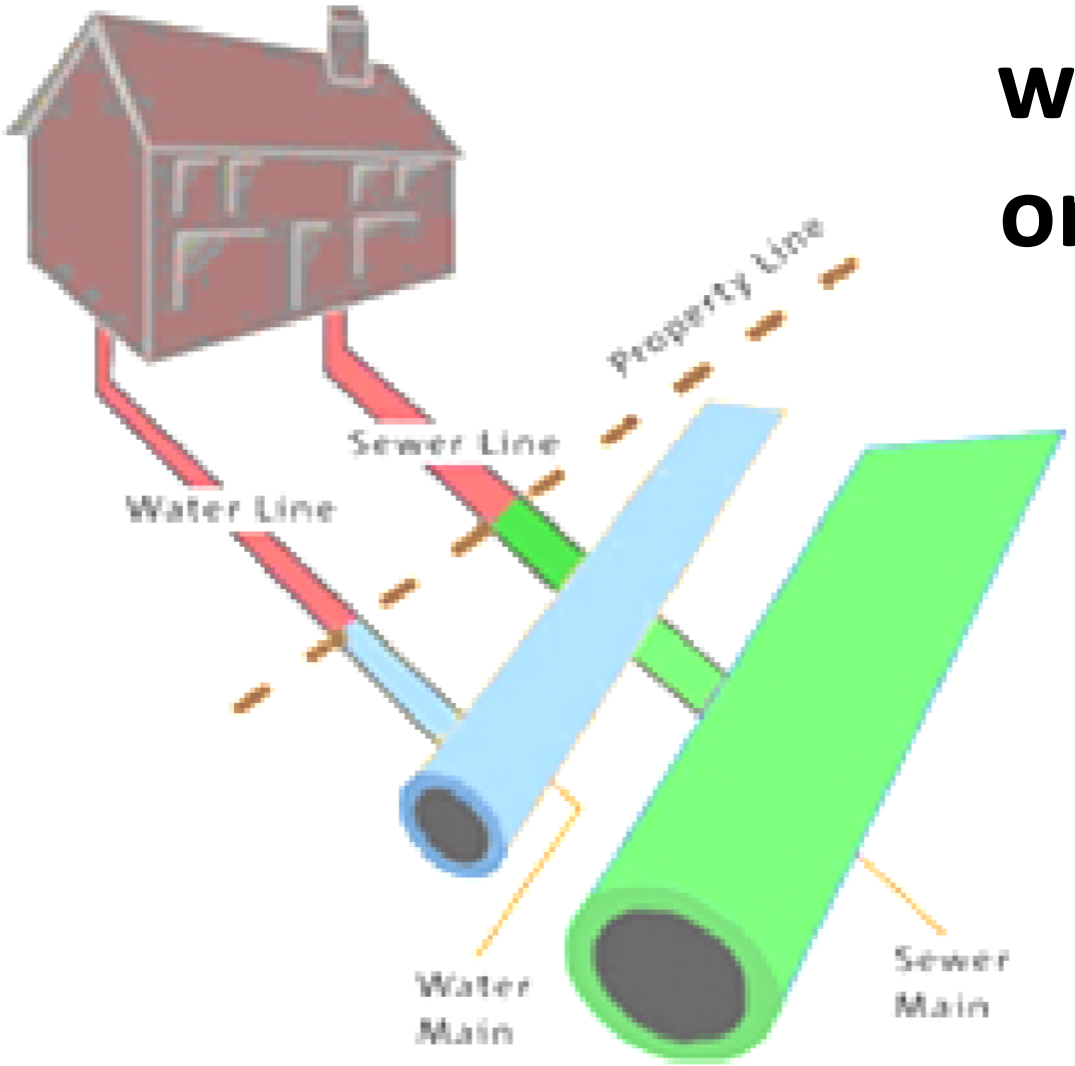
Matt Sigler
Technical Director
Plumbing Manufacturers International
Cell: 847-217-7212
Email: msigler@pmihome.org
www.pmihome.org
www.safeplumbing.org

Safe, responsible plumbing. Always.

SAVE THE DATE: PMI's Fall Conference is October 27-30, 2014 at The Westin O'Hare in Rosemont, IL

Mission Statement

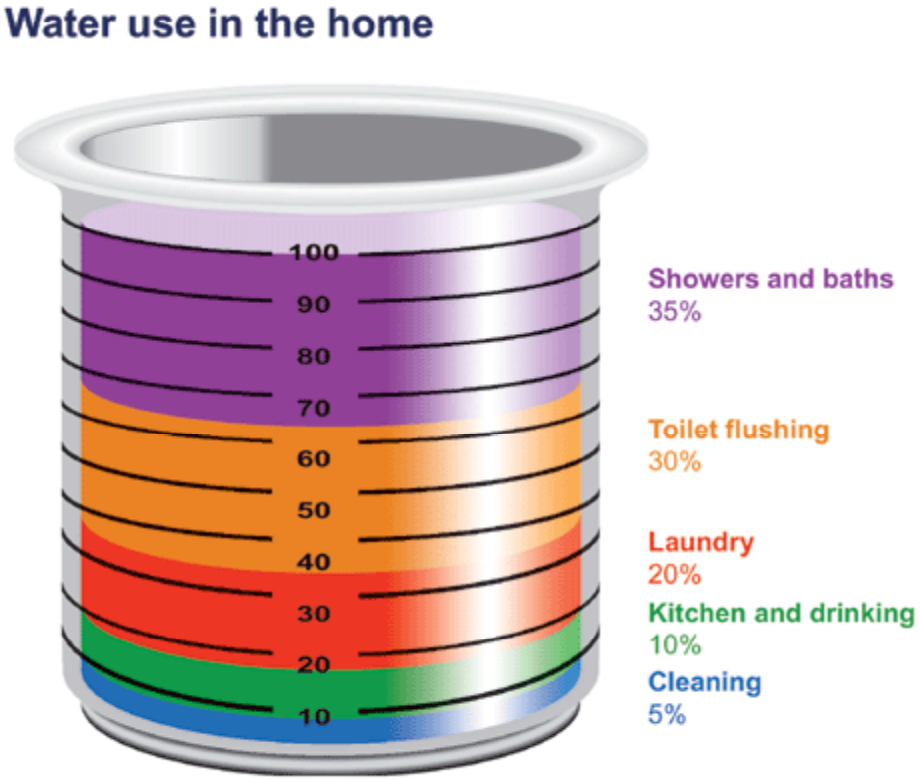
Impact of reduced water consumption on drainage system



For CACP 2014
Presented by: Kevin Wong

Impact of reduced water consumption on drainage system

- Using less potable water for non-potable applications is a positive thing



Source: Environment Canada

Impact of reduced water consumption on drainage system

Rainwater harvesting standards being developed

Grey water standards and codes being adopted

Grease Interceptors are getting mandated into sewer use and plumbing policy

New objective in the code for water use efficiency

All positive developments

Impact of reduced water consumption on drainage system

- These changes demand a couple of things that we have to look at, to take a balanced approach at maintaining the whole system…
  - Chemistry of wastewater
  - Aging infrastructure of our collection & treatment systems
  - Lowered sewer flows and drainline carry issues

Impact of reduced water consumption on drainage system

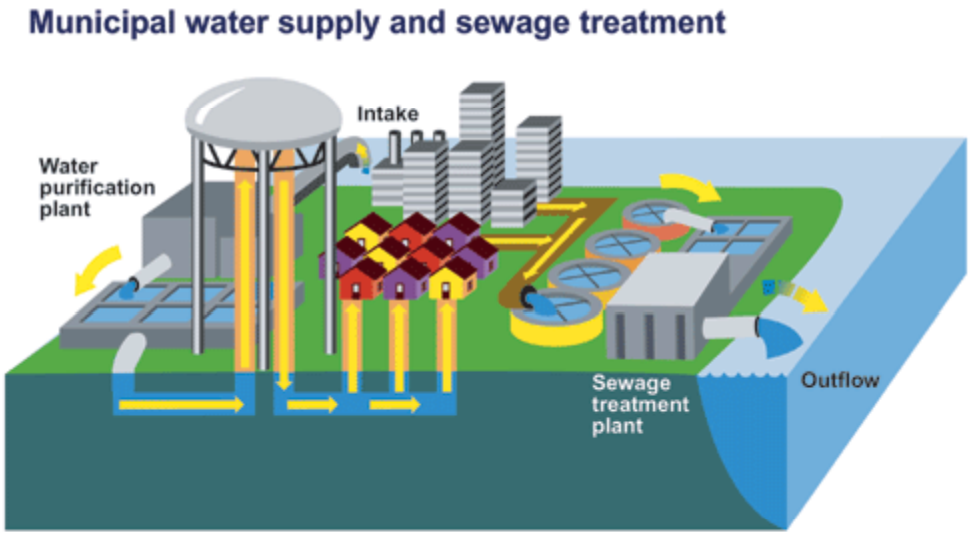
- We are only now starting to look at these issues in the larger context of the existing infrastructure and the existing dynamics.

The PERC Study gave us some information that lead to the PERC II studies (currently under development).

BNQ, Alberta and Ontario have taken stabs at this in their standards, policies and code.

The book is not closed on this as yet.

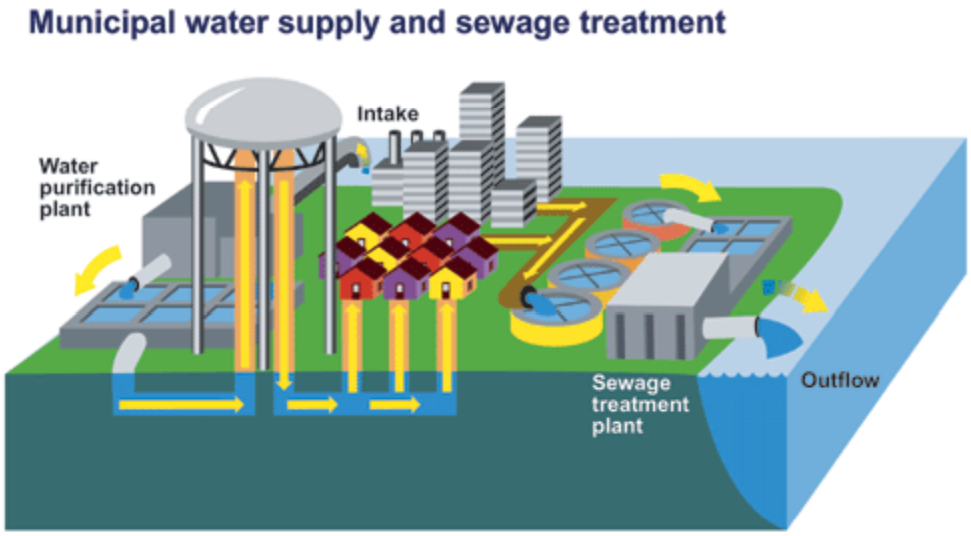
Impact of reduced water consumption on drainage system



Source: Environment Canada

- Wastewater treatment plants across Canada are experiencing situations where the wastewater coming to the plant is overstrength. This means it will cost additional money to treat in some manner.

Impact of reduced water consumption on drainage system



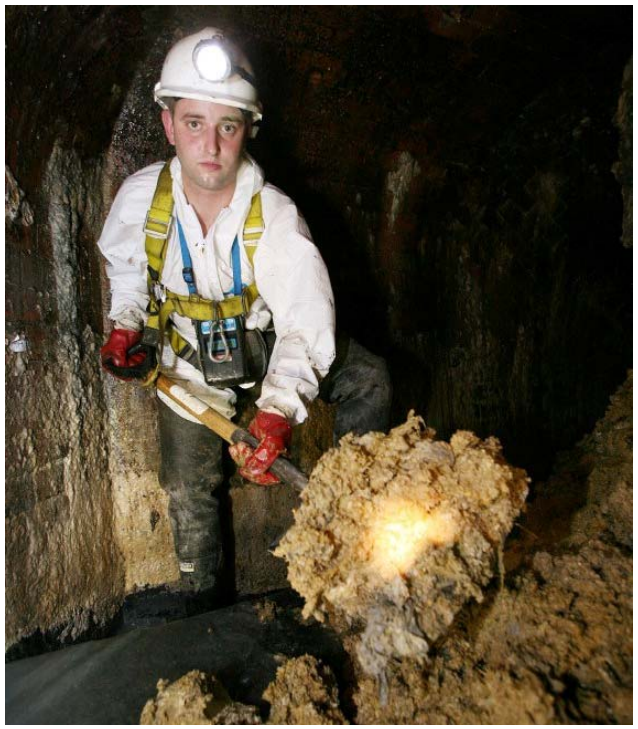
Source: Environment Canada

"An increasing number of Canadian municipalities are considering water conservation as the key to keeping expansion needs to a minimum. Water conservation also optimizes plant efficiency, while assisting municipalities in financing the replacement of infrastructure that may be over 50 years old in some communities and up to 100 years old in several others."

Impact of reduced water consumption on drainage system

- Aging Wastewater Infrastructure
  - It is not cheap to replace a broken pipe under the ground.
  - Measures must be taken to keep this critical infrastructure clear and intact.
    - FOG management
    - Prevent Clogging and Stagnation of wastewater in the system
    - Optimize hydraulic loading on the system to ensure carry to the WWTP and to dilute overstrength chemistries.

Impact of reduced water consumption on drainage system



Impact of reduced water consumption on drainage system

- On the smaller scale
  - Onsite wastewater treatment technologies may be affected by this first.
  - Lower flows will mean higher chemistries
  - Our rural environment is changing with more Boomers leaving the City to retire in the country.

Impact of reduced water consumption on drainage system

Policy must be integrated to be protective from all aspects

(source-back-to-source)

We can't have the luxury of ending at the property line or the plumbing system.

Questions