

From: [Matt Sigler](#)
To: [Shipman, Ray \(DES\)](#)
Subject: FW: Proposed Amendments to the Washington State Plumbing Code
Date: Tuesday, October 6, 2020 4:01:53 PM
Attachments: [image002.png](#)
[image003.jpg](#)
[image004.jpg](#)
[Washington Amendments - 2018 UPC.pdf](#)
[RE Implementation of New Appliance Efficiency Standards as of January 1 2021.msg](#)
Importance: High

Ray-

FYI – Please let me know when the proposed amendments are going to go into effect. Thank you!

Regards,

Matt Sigler
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From: Matt Sigler
Sent: Tuesday, October 6, 2020 6:59 PM
To: 'sbcc@des.wa.gov' <sbcc@des.wa.gov>
Subject: Proposed Amendments to the Washington State Plumbing Code
Importance: High

Diane-

Regarding the attached amendments to the Washington State Plumbing Code, PMI offers the below three comments for consideration.

Key:
[Delete text](#)
[Add text](#)

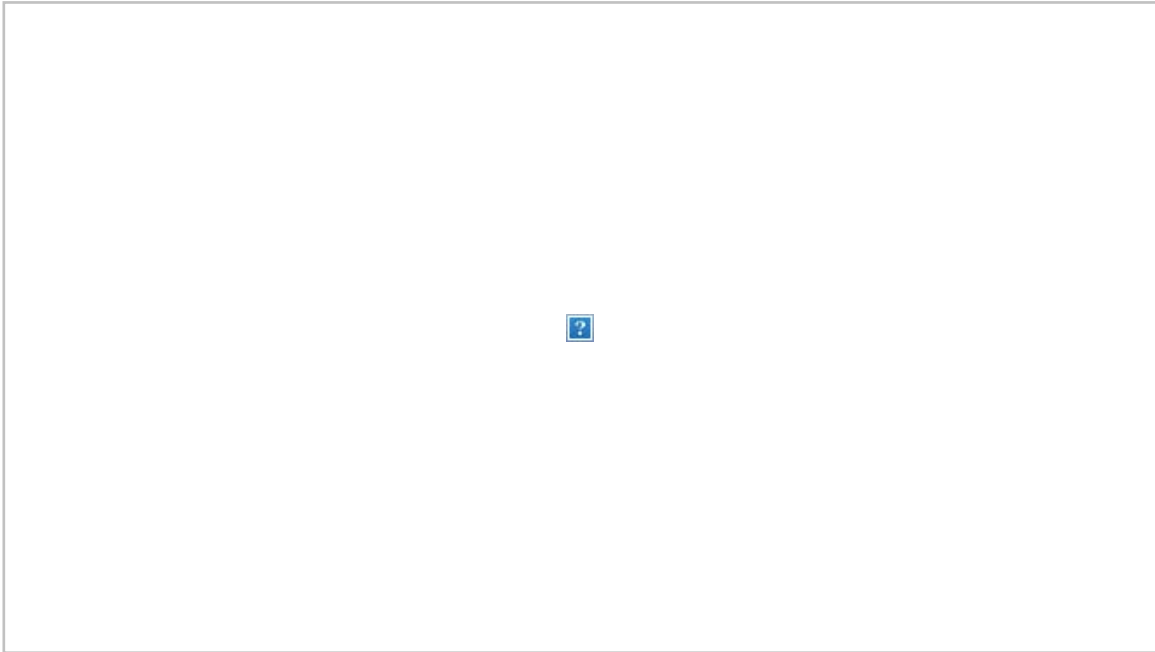
1. **Proposed change**

408.2.5 Tub Spout Diverters and Showerhead Tub Spout Diverter Combinations. *The tested leakage rate of tub spout diverters shall be not greater than 0.01 gallons per minute when new and no greater than 0.05 gallons per minute after 15,000 test cycles. Showerhead tub spout diverter combinations: Showerhead tub spout diverter combinations shall meet both the standard for showerheads and the standard for tub spout diverters.*

Substantiation

The proposed requirements are intended to be validated during product testing and certification, and not by the inspector in the field. These requirements which are based on California’s Title 20 requirements (which is indicated

in California's MAEDbS system, see below) only apply to product sales and not Title 24 (CA Plumbing Code and CALGreen) that apply to product installations. Furthermore, according to the Washington State Department of Commerce (see attached e-mail), the state will be using California's MAEDbS system to ensure products are compliant with the requirements of Washington Assembly Bill 1444 that go into effect on January 1, 2021. Therefore, the proposed Section 408.2.5 should not be added to the state's plumbing code.



2. **Proposed change**

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411.2.2 Performance. *Water closets installed in residential occupancies shall meet or exceed the minimum performance criteria developed for certification of high-efficiency toilets under the WaterSense program sponsored by the U.S. Environmental Protection Agency (EPA).*

Substantiation

The above text that is based on Section 411.2.3 of the 2019 California Plumbing Code only applies to residential occupancies (see below text from the 2019 CPC).

411.2.3 Performance [HCD 1 & HCD 2]. *Water closets installed in residential occupancies shall meet or exceed the minimum performance criteria developed for certification of high-efficiency toilets under the WaterSense program sponsored by the U.S. Environmental Protection Agency (EPA).*

3. **Proposed change**

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412.1 Application. *Urinals shall comply with ASME A112.19.2/CSA B45.1, ASME A112.19.19, or CSA B45.5/IAPMO Z124. Wall-mounted urinals shall have an average water consumption not to exceed 0.125 gallons (0.47 L) per flush. Other urinals shall have an average water consumption not to exceed 0.5 gallons (1.89 L) per flush.*

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Substantiation

The proposed amendment to Section 412.1 leaves out two important industry standards for urinals, ASME A112.19.19 that applies to nonwater urinals and CSA B45.5/IAPMO Z124 that applies to plastic urinals. These standards are also found in the Uniform Plumbing Code for which Washington State's Plumbing Code is based (see below code text from the 2021 UPC) and the 2019 California Plumbing Code.

412.1 Application. *Urinals shall comply with ASME A112.19.2/CSA B45.1, ASME A112.19.19, or CSA*

B45.5/IAPMO Z124. Urinals shall have an average water consumption not to exceed 1 gallon (3.8 Lpf) of water per flush.

Additionally, the 0.125 gpf requirement which is based on California only applies to wall-mounted urinals (see below code text from the 2019 California Plumbing Code).

412.1 Application. Urinals shall comply with ASME A112.19.2/CSA B45.1, ASME A112.19.19, or CSA B45.5/IAPMO Z124. *Wall-mounted urinals shall have an average water consumption not to exceed 0.125 gallons (0.47 L) per flush. Other urinals shall have an average water consumption not to exceed 0.5 gallons (1.89 L) per flush.*

If I can answer any questions regarding the above comments, please do not hesitate to contact me at your convenience.

Regards,

Matt Sigler

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Safe, responsible plumbing. Always.

