



October 29, 2018

Mia Marvelli
Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

SUBJECT: COMMENTS ON PROPOSED CHANGES TO THE CALIFORNIA
PLUMBING CODE

Dear Ms. Marvelli:

The purpose of this letter is to provide comments to proposed amendments to the California Plumbing Code as presented in the Express Terms prepared separately by the Building Standards Commission (BSC), the Department of Housing and Community Development (HCD), and the Department of Water Resources (DWR). These amendments address dual plumbed buildings where non-potable water is used for toilet and urinal flushing.

Irvine Ranch Water District (IRWD) is a strong proponent for the use of recycled water. For more than 50 years, the District has provided recycled water service. In 1991, IRWD was the first agency in California to work with a customer to dual plumb a high-rise office building. Today IRWD serves recycled water to more than 100 dual plumbed commercial buildings including office buildings, parking structures, community centers, public and private schools, and a hotel. Additionally, IRWD serves recycled water to more than 650 dual plumbed, single-family residences, where recycled water is used for irrigating front and back yards.

On an annual basis, IRWD serves approximately 25,000 acre-feet of recycled water, which fulfills more than 25% of IRWD's total water demands. Given IRWD's extensive experience with recycled water and dual plumbed use sites, the District offers the following general and specific comments on the draft Plumbing Code.

General Comments:

IRWD is providing the following general comments which are applicable to the draft Plumbing Code amendments prepared separately by the BSC, HCD and DWR:

- IRWD believes adding more requirements for the use of recycled water (i.e., requiring operation and maintenance manuals for each recycled water use site) will be burdensome, costly to produce and implement, and a disincentive for both agencies

and customers to expand the use of recycled water in California. Recycled water has been used in California for many decades, largely without incident. The State encourages the use of recycled water; however adding these types of requirements could hamper the State's ability to realize its full potential of recycled water use throughout California. The District recommends that the additional requirements for manuals be removed from the draft Plumbing Code.

- The draft Plumbing Code refers to the "Authority Having Jurisdiction" and the "Enforcing Agency" on many occasions. These terms are vague and ambiguous. While these terms may refer to a city or county, there could be confusion when a Regional Water Quality Control Board has issued a permit to a water district that has jurisdiction within a city or county. The Plumbing Code should be modified to provide clarification associated with multi-jurisdictional situations.
- Title 17 requires water agencies to protect public water supply systems, commonly in the form of reduced-pressure principle backflow prevention assemblies (also referred to as "RPs") being installed immediately downstream of customers' meters. IRWD believes meter protection through the use of RPs should be required at any residential property where graywater, treated graywater, or rainwater is being used for non-potable applications. We ask that this requirement be added to the draft Plumbing Code.

Specific Comments Associated with BSC Amendments:

In addition to the general comments offered above, IRWD offers the following specific comment on the Plumbing Code amendments proposed by the BSC:

Section 1503.3 – Connections to Potable and Reclaimed (Recycled) Water Systems – Exception 2

Comment: The BSC should require the use of an RP if a potable water supply is used to temporarily test a gray water system.

Specific Comments Associated with HCD Amendments:

In addition to the general comments offered above, IRWD offers the following specific comment on the Plumbing Code amendments proposed by HCD:

Section 601.3.2 – Color and Information

Comment: The "do not drink" symbol included in this section, which is depicted by the glass with water, is outdated. IRWD recommends the symbol shown in DWR's Express Terms, Section 1505.9 (page 13 of 15) showing the profile of the person drinking should be used as it more clearly depicts the idea of "do not drink."

Specific Comments Associated with DWR Amendments:

In addition to the general comments offered above, IRWD offers the following specific comments on the Plumbing Code amendments proposed by DWR:

Section 205.0 – Definition of a Cross-Connection

Comment: IRWD suggests that the definition of “Cross-Connection” be changed to match the definition found in Section 7583(e) of Title 17 of the California Code of Regulations.

Section 1505.4 – Connections to Potable or Reclaimed (Recycled) Water Systems

Comment: IRWD suggests the following changes be made to the proposed text of Section 1505.4:

“Active recycled water supply systems shall have no connection to a potable water supply or alternate water source system. Potable water is permitted to be used as makeup water for a reclaimed (recycled) water storage tank provided the water supply inlet is protected by an air gap ~~or a reduced-pressure principle backflow preventer~~ in accordance with this code.”

Exception (2) – “A potable water supply may be connected temporarily for initial testing and pre-activation of the recycled water supply system as provided in Section 1505.13.2.2. Prior to temporarily connecting the potable line to the recycled water supply system for initial testing purposes, the potable line must have a reduced-pressure principle backflow preventer installed.”

Section 1505.13.2 – Cross-Connection Inspection and Testing

Comment: IRWD suggests the following language be added to Section 1505.13.2:

“A certified AWWA Cross-Connection Control Program Specialist with the Authority Having Jurisdiction (Responsible Agency) may modify these procedures based on field conditions where shutting off and draining either the potable or recycled water system is not practical and would negatively impact the operation of the facility.”

IRWD appreciates your consideration of above comments on the draft Plumbing Code. In the future, IRWD recommends that the three agencies (BSC, HCD, and DWR) work together to publish a single set of proposed code amendments. This would simplify future review by

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stakeholder agencies. If you have any questions regarding this communication, please contact Mark Tettemer at (949) 453-5592 or at tettemer@irwd.com.

Sincerely,



Paul A. Weghorst
Executive Director of Water Policy

cc: Michael Nearman, Deputy Executive Director