

MEMORANDUM

TO: All Interested Parties
FROM: Enrique Gonzalez, Staff Liaison
DATE: January 3, 2017
SUBJECT: Proposed TIA (Log No. 001-15) to UNIFORM PLUMBING CODE, Section 402.6.1.

In accordance with the IAPMO Regulations Governing Committee Projects, the attached proposed Tentative Interim Amendment (TIA) to the 2015 edition of the UNIFORM PLUMBING CODE is being submitted for public comment. The TIA (Log No. 001-15) is on UPC, Section 402.6.1.

We invite all interested parties to review the proposed TIA and to respond by filling out the attached comment form. You may fax in the completed form to Codes Department, 909-472-4246. **The final closing date for receiving comment forms for this TIA is January 24, 2017.**

Thank you for your time and interest in the development of the Uniform Plumbing Code.

In accordance with the IAPMO [Regulations Governing Committee Projects](#) this, a proposed TIA which has been submitted for processing pursuant to Section 5-1 of the Regulations, will be automatically docketed as an appeal on the agenda of the IAPMO Standards Council. Any party may advocate their position before the Council. Please note that most Council meetings are held via teleconference.

Parties wishing to address the Council shall notify the Council Secretary no later than 48 hours prior to the Council meeting. Although not required, parties wishing to advocate a position are encouraged, to the extent practicable, to file written submissions in general conformance with Section 1-6.3 and Section 1-6.4 of the Regulations in advance of the meeting at which action will be considered.

When an automatically docketed appeal has not been pursued by any party, the Council will not consider the matter as an appeal.

This TIA will be on the Council agenda schedule – date to be determined.

FORM FOR TIA COMMENT ON IAPMO UPC/UMC COMMITTEE DOCUMENT

NOTE: All comments MUST be received by 5:00 PM PST on Tuesday, January 24, 2017.

For further information on the standards-making process, please contact
Codes and Standards Administration at 909-472-4110

For technical assistance, please call IAPMO at 909-230-5535

FOR OFFICE USE ONLY

RESP # : _____

DATE REC'D: _____

Please Print or Type using Black Ink

Date: _____ Name: _____ Telephone #: _____

Company: _____

Street Address: _____ City: _____ State: _____ Zip: _____

Please Indicate Organization Represented (if any): _____

1. a) **IAPMO Document Title** Uniform Plumbing Code **Document Year** 2015

b) **Section/Paragraph** Section 402.6.1

c) **Comment on TIA: Item #** UPC TIA 001-15

2. **Comment Recommends** (check one): New Text Revised Text Deleted Text

3. **Comment** (Include proposed new or revised wording, or identification of wording to be deleted):
[Note: Proposed text should be in legislative format: i.e., use underscore to denote wording to be inserted (inserted wording) and strike-through to denote wording to be deleted (~~deleted wording~~).
PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK.]

4. **Statement of Problem and Substantiation for Comment:** [Note: State the problem that will be resolved by your recommendations; give the specific reason for your proposal including copies of tests, research papers, etc. If more than 200 words, it may be abstracted for publication.]

5. **This comment is original material.** [Note: Original material is considered to be the submitter's own idea based on or as a result of his/her own experience, thought, or research and, to the best of his/her knowledge, is not copied from another source.]
 This comment is not original material, its source (if known) is as follows: _____

I hereby grant IAPMO all and full rights in copyright, in this proposal, and I understand that I acquire no rights in any publication of IAPMO in which this proposal appears in this or another similar or analogous form is used.

I do not now hold and I do not intend to hold any patent, the use of which would be required for compliance with this proposal.

Signature (**Required**): _____

Please use separate form for each comment.

INSTRUCTIONS FOR SUBMITTING COMMENTS
– PLEASE READ CAREFULLY –

1. Type or print in BLACK ink.
2. Indicate the title of the document and the document year. In addition, indicate the specific section or paragraph and the Item number shown in the Report on Proposals (ROP) that the comment applies to.
3. Check the appropriate box to indicate whether this comment recommends adding new text, revising proposed text, or deleting proposed text.
4. In the space identified as “Comment”, indicate the exact wording you recommend as new or to revise proposed text, or the text you recommend be deleted.
5. In the space title “Statement of Problem and Substantiation for Comment”, state the problem which will be resolved by your recommendation and give the specific reason for your comment. Include copies of test results, research papers, fire experience, or other materials that substantiate your recommendation. [See note below, item (f).]
6. Check the appropriate box to indicate whether or not this comment is original material, and if it is not, indicate the source of the material.
7. Sign the comment. (Required)

If supplementary material (photographs, diagrams, reports, etc.) is included, you may be required to submit sufficient copies for all members and alternates of the technical committee. The technical committee is authorized to abstract the “Statement of Problem and Substantiation for Comment” if it exceeds 200 words for publication in the Report on Comments.

NOTE: The IAPMO Regulations Governing Committee Projects in Paragraph 4-4.4 state: Each comment shall be submitted to the Council Secretary and shall include: (a) identification of the submitter and his or her affiliation (i.e., technical committee, organization, company), where appropriate; (b) identification of the document, edition of the document, and paragraph of the document to which the proposal is directed; (c) the proposed text of the proposal, including the wording to be added, revised (and how revised), or deleted; (d) a statement of the problem and substantiation for proposal; (e) the signature of the submitter; and, (f) two copies of any document(s) (other than an IAPMO document) being proposed as a reference standard or publication (see 3-3.7).

UNIFORM PLUMBING CODE TIA FORM – 2015

Reference Code Section: 402.6.1

Submitter Name: Timothy Wood
Company: Barracuda Brackets LLC
Address: 1580 Columbia TNPK, Castleton NY 12033
Phone number: 518-326-1354

Proposed language for TIA: Revise Section 402.6.1 to read as follows:

402.6.1 Closet Rings (Closet Flanges). Closet rings (closet flanges) for water closets or similar fixtures shall be of an approved type and shall be copper alloy, copper, hard lead, cast-iron, galvanized malleable iron, ABS, PVC, or other approved materials. Each such closet ring (closet flange) shall be approximately 7 inches (178 mm) in diameter and, where installed, shall, together with the soil pipe, present a 1½ inch (38 mm) wide flange or face to receive the fixture gasket or closet seal.

Caulked-on closet rings (closet flanges) shall be not less than ¼ of an inch (6.4 mm) thick and not less than 2 inches (51 mm) in overall depth.

Closet rings (closet flanges) shall be burned or soldered to lead bends or stubs, shall be caulked to cast-iron soil pipe, shall be solvent cemented to ABS and PVC, and shall be screwed or fastened in an approved manner to other materials.

Closet bends or stubs shall be cut off so as to present a smooth surface even with the top of the closet ring before rough inspection is called.

Closet rings (closet flanges) shall be adequately designed and secured to support fixtures connected thereto, and suitably flanged to provide a water-tight joint in the floor.

Substantiation:

Technical Merit: Currently floor drains are required to be installed properly in part to protect the integrity of the surrounding materials from water damage. This water damage can include mold which has been proven to be a health hazard to humans. Adding toilet flanges to this code language makes sense because the spirit of the code is to protect property and consumers from hazards. The DWV line to the floor drain can be the same as the toilet flange so the toilet flange should carry the same floor sealing requirements. If it is appropriate to seal a hole in the floor watertight for a floor drain, then all holes in every floor should be sealed watertight including holes for toilet flanges for the initial code to be consistent.

Emergency Nature: Mold is a proven killer. Toilet flanges that are not sealed watertight to the floor like any floor drain can allow mold to grow. Some states have special legislation dealing with consumer protection from mold, protocols for removing mold and public awareness campaigns to educate the consumer on the dangers of mold. Toilet flanges that do not seal the floor watertight put every consumer unnecessarily at risk of mold exposure when the toilet leaks or water gets under the toilet from an outside source.

I hereby grant IAPMO all and full rights in copyright, in this proposal, and I understand that I acquire no rights in any publication of IAPMO in which this proposal appears in this or another similar or analogous form.

Submitter signature (required):  Date: 12-07-2016
Mailto: Codes Department · IAPMO · 4755 E. Philadelphia Street, Ontario, CA · 91761-2816 FAX: 909-472-4246