

MEMORANDUM

TO: All Interested Parties
FROM: Zalmie Hussein, Staff Liaison
DATE: June 27, 2018
SUBJECT: Proposed TIA (Log No. 005-18) to the UNIFORM MECHANICAL CODE, Section 1003.3.

In accordance with the IAPMO Regulations Governing Committee Projects, the attached proposed Tentative Interim Amendment (TIA) to the 2018 edition of the UNIFORM MECHANICAL CODE is being submitted for public comment. The TIA (Log No. 005-18) is on the UMC, Section 1003.3.

We invite all interested parties to review the proposed TIA. If you wish to submit a comment in regards to this TIA, fill out the [TIA Comment Form](#). Email the completed form to zalmie.hussein@iapmo.org. The closing date for submitting comment forms for this TIA is Friday, July 13, 2018.

Thank you for your time and interest in the development of the Uniform Mechanical 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 Sections 1-6.3 and 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 on August 23, 2018.

FORM FOR TIA COMMENT ON IAPMO UPC/UMC COMMITTEE DOCUMENT

NOTE: All comments MUST be received by 5:00 PM PDT on Friday, July 13, 2018.

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

For technical assistance, please call IAPMO at 909-218-8122

FOR OFFICE USE ONLY

RESP # : _____

DATE REC'D: _____

Date: _____ Name: _____ Telephone #: _____

Company: _____

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

Please Indicate Organization Represented (if any): _____

1. a) IAPMO Document Title: Uniform Mechanical Code Document Year: 2018

b) Section/Paragraph: Section 1003.3

c) Comment on TIA: UMC TIA 005-18

2. Comment Recommends (check one): AGREE DISAGREE

3. Substantiation for Comment:

Signature (**Required**): _____

Please use a separate form for each comment.

INSTRUCTIONS FOR SUBMITTING COMMENTS
– PLEASE READ CAREFULLY –

1. Complete form digitally by filling in each item described.
2. Check the appropriate box to indicate whether this comment recommends agreeing or disagreeing with the proposed TIA.
3. In the space title “Substantiation for Comment”, state the reason for your comment.
4. Sign the comment. (Required)

NOTE: The IAPMO Regulations Governing Committee Projects in Section 5-4(c): All public comments, ballots, and comments on ballot on the proposed TIA shall be summarized in a staff report and forwarded to the Council for action in accordance with Section 5-5.

UNIFORM MECHANICAL CODE TIA FORM - 2018

Reference Code Section: 2018 Uniform Mechanical Code

Submitter Name: Jeff Kleiss
Company: Lochinvar, LLC.
Address: 300 Maddox Simpson Pkwy.
Lebanon, Tennessee 37090
Phone number: 615/889-8901 xt: 2224

Proposed language for TIA:

1003.3 Gauges. Steam boilers shall be provided with a pressure gauge and a water level glass. Water boilers shall be provided with a pressure gauge and a temperature gauge. ~~Automatic boilers shall be equipped with the following gauges, as applicable:~~

- ~~(1) Oil temperature~~
- ~~(2) Oil suction pressure~~
- ~~(3) High and low gas pressure~~
- ~~(4) Stack temperature~~
- ~~(5) Windbox pressure~~

Substantiation:

Technical Merit:

Gauges were added to the UMC (Uniform Mechanical Code) that do not enhance the safety of the products or users, add unnecessary cost to boilers and make virtually all current boiler designs non-compliant.

The requirement for steam and water pressure gauges are consistent with requirements in the ASME Code books and do add to operator safety. A typical operator will know or can easily identify the desired operating pressure and the maximum allowable working pressure. The pressure gauges (required by ASME Code) will be located where they can be easily observed and an operator can take action to shut down the boiler and evacuate the area if an excessive pressure is indicated.

Gauges on the oil temperature, oil pressure, gas pressure, stack temperature and windbox pressure are typically connected only when an authorized service technician is checking / adjusting combustion. Permanently installed fuel pressure gauges will not be visible unless boiler jackets are removed. Even if the gauges were visible they would have no value for a typical end user since only a service technician would know if the readings were normal. These gauges are service devices, not safety devices and they will not enhance the safety of users / operators.

Because these gauges are service devices and not required by the ASME Code or ANSI standards applicable to these boilers, manufacturers have not included these gauges in their certified boiler designs. If the gauges were required to be added to the boiler designs, fuel trains and other parts of the boiler designs would have to be revised to add the gauges, requiring

updates to the boiler certification files at considerable expense to the manufacturers. Some enclosures and designs might not allow space for permanently mounted gauges and require additional redesigns. Finally, the addition of the gauges would add unnecessary expense to every boiler.

Automatic boilers are designed with automatic safety devices and limit controls to automatically shut down the boilers when appropriate. The gauges listed for automatic boilers are useful only for a service technician and are not appropriate or useful as safety devices and should be removed from the requirements in the UMC.

Please note that the phrase "as applicable" does not suggest that the gauges are optional, rather that gauges suitable for oil burners are required for oil burners and gauges suitable for gas boilers are required for gas boilers.

Emergency nature:

The current UMC language makes all currently produced boilers non-compliant. The confusion created by the UMC requirement may lead to the unnecessary shut down of otherwise compliant boilers by well-intentioned inspectors.

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: 5/31/18

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FAX: 909-472-4246