

## MEMORANDUM

**TO:** All Interested Parties  
**FROM:** Enrique Gonzalez, Staff Liaison  
**DATE:** Thursday, November 21, 2019  
**SUBJECT:** Proposed TIA (Log No. 004-18) to UNIFORM PLUMBING CODE, Section 1506.7 (On-Site Treated Nonpotable Water Devices and Systems).

In accordance with the [IAPMO Regulations Governing Committee Projects](#), the attached proposed Tentative Interim Amendment (TIA) to the 2018 edition of the UNIFORM PLUMBING CODE is being submitted for public comment. The TIA (Log No. 004-18) is on UPC, Section 715.3 (On-Site Treated Nonpotable Water Devices and Systems).

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 attached [TIA Comment Form](#). Email the completed form to [enrique.gonzalez@iapmo.org](mailto:enrique.gonzalez@iapmo.org). The closing date for submitting comment forms for this TIA is **Monday, December 2, 2019**.

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

In accordance with the [IAPMO Regulations Governing Committee Projects](#), a proposed TIA, which has been submitted for processing pursuant to 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 Standards Council Meeting Agenda to be announced at a later date.

Should you require assistance, please contact me at (909) 230-5535 or by email at [enrique.gonzalez@iapmo.org](mailto:enrique.gonzalez@iapmo.org).

Best regards,

Enrique Gonzalez

# FORM FOR TIA COMMENT ON IAPMO UPC/UMC COMMITTEE DOCUMENT

**NOTE: All comments MUST be received by 5:00 PM PST on Monday, December 2, 2019.**

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: \_\_\_\_\_

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: 2018

b) Section/Paragraph: Section 1506.7

c) Comment on TIA: UPC 004-18

2. Comment Recommends (check one):  AGREE  DISAGREE

3. Substantiation for Comment:

Signature (**Required**): \_\_\_\_\_

Please use 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.

## UPC TIA 004-18

### UNIFORM PLUMBING CODE TIA FORM - 2018

Reference Code Section: 1506.7

#### Submitter

Name: Kevin G. Minissian  
Company: Norchem Corporation  
Address: 5649 Alhambra Ave, Los Angeles, CA 90032  
Phone number: 323-221-0221

#### Proposed language for TIA:

##### Edit text as follows:

**1506.7 On-Site Treated Non-potable Water Devices and Systems.** Devices or equipment used to treat on-site residential treated non-potable water to maintain the water quality requirements determined by the Authority Having Jurisdiction shall be listed or labeled (third-party certified) by a listing agency (accredited conformity assessment body) or approved for the intended application. Devices or equipment used to treat on-site treated non-potable water for use only in the residential water closet and urinal flushing, surface irrigation, and similar residential applications shall comply with NSF 350 or approved by the Authority Having Jurisdiction. This does not apply to commercial non-potable water reuse.

**Substantiation:** The current language is very general and not specific. NSF or other Authorities do not have standards for non-potable water reuse standards for commercial application over 1500 gallons per day effluent. There are major differences in residential and commercial non-potable effluent that NSF350 does not address.

**Technical Merit:** There is a major distinction between Residential and Commercial non-potable water effluent. Residential effluent is very consistent where commercial varies drastically depending on the use of water in the commercial application.

**Emergency nature:** This is an urgent matter that needs to be addressed to stop permitting authorities to prevent use of non-potable water reuse in commercial establishments. NSF has admitted that NSF350 is not intended for commercial non-potable water reuse, it is only for residential non-potable water reuse (see Attachment 1). We would like IAPMO to send Addendum to 2018 UPC Section 1506.7 to change the language that prohibits use of non-potable water reuse without NSF350.

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: 10/13/2019  
Mail to: Codes Department · IAPMO · 4755 E. Philadelphia Street · Ontario · CA · 91761-2816  
FAX: 909-472-4246



April 4, 2017

Re: NSF/ANSI Standard 350 –Certification Clarification

This American National Standard, NSF/ANSI 350 Onsite residential and commercial water reuse treatment systems, has been developed as part of the ongoing efforts of interested parties to establish minimum material, design and construction, and performance requirements for onsite residential and commercial water treatment systems. This Standard is intended to address public health and environmental issues. Actual performance for any site or system may vary, depending on variations in raw water supply (such as in alkalinity and hardness), graywater constituents, and patterns of use. The end use of the effluent is the responsibility of the owner, design professionals, and regulatory officials.

This Standard was developed by the NSF Joint Committee on Wastewater Technology using the consensus process described in the American National Standards Institute.

NSF/ANSI was first published in 2011, revised in 2012, 2014 and 2017. This Standard was written to cover onsite residential and commercial treatment systems. Commercial facilities were defined in this Standard as:

Businesses such as lodging establishments, business parks and campuses, shopping facilities, places of public assembly where no manufacturing, assembly, industrial or food processing is involved, and laundering facilities for hospitals, hotels, rental uniforms, and other facilities likely to handle high amounts of soiling or high strength commercial cleaners.

Currently, NSF/ANSI Standard 350 does not have the appropriate categories to test and Certify commercial laundry facilities. During the initial Standards Development process, the NSF International 350 Task Group did not have representatives from the commercial laundry sector. As such, the current NSF/ANSI 350 Standard should not be used or required for commercial laundry facilities. However, NSF is currently working with several commercial laundry manufacture representatives to correct and add the appropriate testing regimen for commercial laundry facilities.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Steiner".

Sharon Steiner  
Business Unit Manager  
Wastewater Treatment Unit Program

734-827-6846 (phone)  
734-827-7790 (fax)  
[steiner@nsf.org](mailto:steiner@nsf.org) (email)

cc: