

MEMORANDUM

TO: All Interested Parties
FROM: Enrique Gonzalez, Staff Liaison
DATE: Friday, April 30, 2021
SUBJECT: Proposed TIA (Log No. 003-21) to UNIFORM PLUMBING CODE, Section 611.1.2 (Scale Reduction Devices) and Table 1701.1 (Referenced Standards).

In accordance with the [IAPMO Regulations Governing Committee Projects](#), the attached proposed Tentative Interim Amendment (TIA) to the 2021 edition of the UNIFORM PLUMBING CODE is being submitted for public comment. The TIA (Log No. 003-21) is on UPC, Section 611.1.2 and Table 1701.1.

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. The closing date for submitting comment forms for this TIA is **Friday, May 14, 2021**.

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 heard on June 3, 2021.

Should you require assistance, please contact me at (909) 230-5535 or by email at 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 PDT on Friday, May 14, 2021.

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: 2021

b) Section/Paragraph: Section 611.1.2, Table 1701.1

c) Comment on TIA: UPC 003-21

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 003-21

UNIFORM PLUMBING CODE TIA FORM - 2021

Reference Code Section: 2021 UPC Section 611.1.2 and Table 1701.1

Submitter Name: Jonathan Seccombe
Company: Aqua-Rex LLC
Address: 3301 Spring Mountain Rd. Ste 18
Las Vegas NV 89102
Phone: 949 887 2170

Proposed language for TIA:

Delete text as follows:

~~611.1.2 Scale Reduction Devices. Scale reduction devices shall comply with IAPMO Z601.~~

TABLE 1701.1
REFERENCED STANDARDS

STANDARD NUMBER	STANDARD TITLE	APPLICATION	REFERENCED SECTION
IAPMO Z601-2018	Scale Reduction Devices	Water Conditioning, Water Treatment	611.1.2

(portions of the table not shown remain unchanged)

Substantiation:

Technical Merit:

The 2021 UPC, Section 611.1.2, requires that "scale reduction devices shall comply with IAPMO Z601." It is now perfectly apparent that IAPMO Z601 is defective as a test protocol and does not reflect real-world performance of scale reduction devices. The protocol fails in terms of representative water quality, rig design, accuracy, and reproducibility of results.

An effective alternative test protocol based on IAPMO IGC 335-2018 has been suggested to the Technical Subcommittee (TSC) and Plumbing Standards Committee (PSC) but has been rejected by both committees, for the most part without providing any technical substantiation justifying the rejection.

IAPMO R&T Labs are in the process of developing substantial changes to the current test protocols but these have not been debated by the IAPMO Z601 Committee.

Emergency nature:

Many effective and long standing scale reduction devices could be deemed not to comply with IAPMO Z601 and could be excluded from use in residential homes.

UPC TIA 003-21

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: April 14, 2021

Mail to:

Codes Department · IAPMO · 4755 E. Philadelphia Street · Ontario · CA · 91761-2816
FAX: 909-472-4246