

HALLIWILL AND ASSOCIATES
1654 Landmark Way
Beaumont, CA 92223-8565
951-922-6757
halliwillj@roadrunner.com

October 15, 2008

Gabriella M. Davis, Secretary
IAPMO Standards Council
IAPMO
5001 E. Philadelphia Street
Ontario, CA 91761

Appeal Petition ROP Item # 37, ROC Seq # 20

Section 402.3.1 and Table 14-1 see ROP page 32, ROC page 34 and Technical Meeting Convention (minutes and actions have not been posted as yet.)

On behalf of Caroma an Australian company with offices in the USA I request that the Standards Council review the record of the actions taken during the ROP, ROC and the Technical Meeting Convention to my comment that was made to remove the terms "barrier liquid sealant" for the reasons stated on the record. During the Technical Meeting Convention I tried to state that while at the Technical Committee meeting in Denver someone stated that the term barrier liquid sealant must stay because the Standards Council made a decision that the terminology was correct. The membership took no action to overturn the Technical Committee.

I have not been able to find any record of the Standards Council making such a decision. I remember in the past finding were an action was taken (by the Standards Council or the Technical Committee) to review all sections of the code where liquid or water was to be a part of the trap seal and the decision was made to change the sections throughout the code to require a liquid seal. I have completed an internet search and found what appear to be two such decisions and have attached copies of them IAPMO Standards Council Decision Docket #1124-06 and Dockets #1037-06; 1040-06; 1044-06; 1051-06; 1065-06; 1068-06; ...

While the relief that I was seeking in my comment will not be achieved I feel that the Standards Council should at least strike the reference to barrier liquid sealant to state "Nonwater urinals shall have a liquid trap seal." By making this change all sections of

the code dealing with trap sealing would be consistent and a confusing and undefined term would be removed from the code. Additionally the Technical Committee in their statement stated in part "A liquid trap seal is an ..."

The only persons that I think might be materially affected by any change in this code section language would be the other manufacturers of nonwater urinals. Additionally if a jurisdiction has adopted this new section before it has been officially adopted in its final form by the Standards Council and published.

Thank you for your consideration in this matter and should you have any questions please contact me.

Signed,

John M. Halliwill, REHS
Principal

Attachments: IAPMO Standards Council Decision Docket #1124-06 and Dockets #1037-06; 1040-06; 1044-06; 1051-06; 1065-06; 1068-06; ...