

DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER FACILITIES REGULATION
DOMESTIC WASTEWATER SECTION
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FACSIMILE TRANSMITTAL SHEET

TO: Russ Chaney FROM: Shanin Spearfrost
COMPANY: Int'l Assoc. of Plumbing & Mechanical Fitters DATE: 10/16/08
FAX NUMBER: 909-472-4221 TOTAL NO. OF PAGES INCLUDING COVER: 3
PHONE NUMBER: SENDER'S REFERENCE NUMBER:
RE: UPC Revisions

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 16, 2008

Mr. Russ Chaney
Executive Director
International Association of
Plumbing and Mechanical Officials
5001 E. Philadelphia Street
Ontario, CA 91761

RE: UPC Revisions to Require Use of Purple for Gray Water Systems

Dear Mr. Chaney:

The Florida Department of Environmental Protection (Department) has received a copy of your October 13th letter in response to the WaterReuse Association, Water Environment Federation, and American Water Works Association views on using purple pipe in gray water systems. The proposed revisions to the 2009 edition of the *Uniform Plumbing Code (UPC)* would require purple background (e.g., purple pipe) with black uppercase lettering for gray water systems that reads, "CAUTION: NONPOTABLE WATER, DO NOT DRINK". For similar reasons to those stated in the September 24th letter from the above organizations, the Department also strongly opposes adoption of this standard as proposed. By submittal of this correspondence, the Department wishes to appeal the decision made by the Standards Council.

The purple pipe color has become readily identifiable here in Florida with reuse of reclaimed water. Reclaimed water involves taking domestic wastewater, giving it a high degree of treatment, and using the resulting high-quality reclaimed water for a new, beneficial purpose. Extensive treatment and disinfection ensure that public health and environmental quality are protected. Gray water, however, does not meet this definition.

The use of purple for gray water systems has the potential to confuse our citizens and professionals who may not recognize the significant quality differences between reclaimed water and gray water. If gray water is transported in purple pipe and a public health problem is created through exposure of humans to inadequately treated gray water, most people will fail to recognize the different source of supply.

The use of purple piping for reclaimed water systems is integral to Florida's Cross Connection Control Program. Different backflow prevention measures may be utilized depending on the type of non-potable water, i.e., reclaimed water, stormwater, etc. For this reason, it is important not to confuse other non-potable sources with reclaimed water. By placing gray water in purple pipe, the potential for cross connection between two significantly different quality sources could adversely impact the high quality of reclaimed water systems and create a public health hazard. In order to ensure protection of public health, Rule 62-610.469(7)(f) of the Florida Administrative Code mandates the following:

Mr. Russ Chaney, UPC Revisions to Require Use of Purple for Gray Water Systems

October 16, 2008


Page 2

All piping, pipelines, valves, and outlets shall be color coded, or otherwise marked, to differentiate reclaimed water from domestic or other water. Effective January 1, 1996, underground piping which is not manufactured of metal or concrete, shall be color coded for reclaimed water distribution systems using Pantone Purple 522C using light stable colorants. Other states and local governments/utilities have adopted similar requirements.

These requirements are also part of the Florida Building Code. Furthermore, the use of the purple for reclaimed water pipes is not unique to Florida. The United States Environmental Protection Agency in the September 2004 Guidelines for Water Reuse states "in some areas of the country, water reuse and dual water systems with purple pipe for distribution of reclaimed water have become fully integrated into local water supplies." Even though national color standards have not been established, most manufacturers and local governments have adopted the color purple for reclaimed water systems.

For these reasons, the Department requests that the IAPMO not adopt standards requiring use of purple background (e.g., purple pipe) for gray water systems. Thank you for considering our appeal.

Sincerely,



Richard Drew

Bureau Water Facilities Regulation

Cc: Lynne Sirmnick, IAPMO Director of Code Development
Shanin Speas-Frost, Water Reuse Coordinator, FDEP
Phil Coran, Division of Water Resource Management
Elsa Potts, Office of Wastewater