



October 15, 2008

Ms. Gabriella Davis
Standards Council Secretary
IAPMO
5001 East Philadelphia Street
Ontario, CA 91761-2816
gaby.davis@iapmo.org

Re: Appeal of UPC Item 15

Dear Ms. Davis,

The letter is requesting an Appeal to the IAPMO Standard Council on Item 15 as found in the UPC 2008 Report on Comments. I am also requesting attendance at the IAPMO Standards Council meeting to testify on this item.

Appellant information:

Jeremy Brown
NSF International
789 North Dixboro Rd.
Ann Arbor, MI 48105

Identification of action being appealed:

NSF is appealing the assembly action to accept public comment relative to item 15 of the UPC 2008 ROC.

Relief Requested:

NSF is requesting the Standards Council accept the Technical Committee action to accept item 15 as Amended by the Technical Committee or in other words reject the assembly action on item 15.

Grounds for the Appeal:

The substantiation for the public comment is incorrect.

Supporting Information:

The public comment submitted states that NSF/ANSI 14 is proprietary. NSF/ANSI 14 is of course not proprietary. Any third party certifier can certify products to this standard including IAPMO R&T as documented by their recent press release which is attached.

The correlation task group was correct in recommending the inclusion of NSF/ANSI 14 in the body of the code to clarify the requirement for this standard. This correlates directly to the changes suggested by the standards task group under item 84 and 111 which brings references to standards into the body of the code. The inclusion of NSF/ANSI 14 removes confusion and conflict by clarifying in Section 301 the

products for which the standard applies. Similarly, references to NSF/ ANSI 61 are placed in sections 401.3 and 604.1 to clarify the products for which this standard is required.

Health, safety and performance benefits of NSF/ANSI 14:

NSF-14 requires that all plastic pressure pipe meet long term strength requirements of a minimum 50 year life. Not all the product standards are explicit in this requirement.

NSF has seen product listed by other certifiers to product standards where long term strength was not required. Allowing the installation of plastic piping systems without a minimum 50 year life as required in NSF/ANSI 14 is inconceivable.

NSF/ANSI 14 contains requirements for chlorine resistance of piping materials that are not addressed in ASTM standards. For example, NSF/ANSI 14 establish requirements for the evaluation of materials made on different extrusion lines, variation of material formulations, using multiple colorant packages and minimum requirements for expected failure time and upper and lower prediction limits. Without these requirements, there can be huge inconsistencies in data interpretation.

NSF/ANSI 14 defines quality testing performed at the production facility to ensure product complies with critical quality requirements. For example, based on product type there are requirements for manufacturers to verify dimensions every 2 hours, verify burst strength every 24 hours, or verify impact strength every 24 hours. Manufacturing has in a large part moved to areas of the world where quality is not a major concern. Reference to NSF/ANSI 14 is essential to ensuring some level of consistency in the industry. Quality control requirements are very common in copper, cast iron, gas and electrical standards.

Residual Vinyl Chloride Monomer (RVCM) is required to be monitored 3 times per year on vinyl type products within NSF/ANSI 14. Because of this stringent monitoring requirement, the vinyl industry has a very long record of providing products compliant with the requirement of health based standards. This monitoring is essential to ensuring safety of drinking water products and the environment.

NSF/ANSI 14 has inherent viscosity requirements for PVC resins used in PVC pipe and fitting compounds. NSF/ANSI 14 is the only standard which has minimum requirement for this for pressure *fittings* and also DWV and *sewer pipe and fittings*. Establishing requirements for the resin are key to establishing products that meet short and long term performance requirements.

Opponents to NSF/ANSI 14 state that ISO Guide 7 does not allow quality control or certification requirements to be included in the normative requirements. First, ISO Guide 7 is not a requirement of IAPMO code change process. If it were, several UL, ASTM, CISPI and other national standards which also have quality control requirements would not be allowed in the UPC. Based on this, ISO Guide 7 cannot be used as a justification to reject item 15. Further, ISO Guide 7 is meant only as a guide and is not written in mandatory language. In fact it does provide one example of appropriate use of quality control requirements within quality assessment standards of electronic components.

The International Plumbing Code, International Residential Code and several other plumbing codes require plastic piping and fittings to comply NSF/ANSI Standard 14. As IAPMO tries to expand the scope of the Uniform Plumbing Code, the codes will be compared to determine the level of health and



safety benefits provided by the code. Certainly the Uniform Plumbing Code would be in a stronger position of quality and health benefits by the adoption of NSF/ANSI Standard 14.

I urge the IAPMO Standards Council to uphold the recommendation of the correlation task group and the Technical Committee by accepting committee action to accept as amended by the TC for item 15 or in other words reject the assembly action to accept the public comment on item 15.

Thank you for the opportunity to submit this appeal. Please contact me if you have questions or comments.

Regards,

Jeremy Brown

Jeremy Brown
Codes & Regulatory Manager
NSF International
phone 1-734-769-5196
fax 1-734-827-7129
mobile (after 5:00pm EST) 1-734-395-4667
brown@nsf.org

FOR IMMEDIATE RELEASE

Contact: Dawn LaFleur-Qualley
909-230-5527
dawn.lafleur-qualley@iapmort.org

IAPMO R&T Includes NSF 14 Listing Free to All Existing Clients' Files

Ontario, Calif. (Oct. 10, 2008) — In a move to increase the already impressive value of the IAPMO R&T third party certification service, IAPMO R&T has included for free a separate NSF 14 listing to all listees with files to related criteria, although such listing is not required by the *Uniform Plumbing Code*.

According to Shahin Moinian, senior director of IAPMO R&T: "Our clients already have met the standards required by the *Uniform Plumbing Code*; adding the NSF 14 conformity provides more for our clients than what is offered by other agencies. Our clients are very value conscious in these tough economic times and we will do anything we can to assist them get to the marketplace faster and as cost effectively as possible."

Since 1936, Authorities Having Jurisdiction have trusted IAPMO R&T to certify plumbing products that meet the required standards.

For more information on product listings, contact Karen.Snowden@IAPMORT.org or by phone at 877-4UPC-MARK.

#

IAPMO R&T certifies and lists plumbing and mechanical products according to established US and Canadian codes and standards, ensuring continuous compliance to such documents. IAPMO R&T is part of The IAPMO Group's family of companies.

Ph: 909.472.4100 • Fax: 909.472.4150 • Web: www.iapmo.org

5001 East Philadelphia Street • Ontario, California 91761-2816 – USA

