

March 27, 2023



Joseph Ricker, Attorney,
Department of Safety and Professional Services
Division of Policy Development
P.O. Box 8366
Madison, WI 53708-8366

My name is Jeffrey J Beiriger, and I am a resident of Menasha, Wisconsin. I am the Executive Director of the Plumbing Heating Cooling Contractors Association of Wisconsin, and I am testifying on behalf of that group today.

First, I want to thank the Department for its work on this rule. I also want to thank the individuals who served on each of the two code advisory committees that were convened to provide input on this rule. It can't be overlooked that a fair amount of this work was done under the difficult circumstances brought on by the pandemic. Discussions about code are challenging enough without adding the complication of virtual meetings.

As an industry, we take great pride in what we do. Our pride extends to our code, which we see as one of the best in the country if not the world. What makes it so good, in our mind, is that it has been developed by people right here in Wisconsin and represents the interests of all of the industry stakeholders. There is a strong, vested interest in our code and advancing that code. Being part of the process to improve and update that code is a responsibility that we do not take lightly.

Before moving to my testimony, I want to express my hope for continued, ongoing discussions with the Department on matters related to plumbing. This project has been the focus of our work together for more than five years. As it nears completion, we respectfully ask that we continue our dialogue through regular meetings of the Department (specifically plumbing section) and the industry. Even two or three meetings a year will help us remain united in our mission of clean water and sanitary conditions, all in support of public health and safety.

With that said, I note that my testimony today is largely a repeat of testimony that we have provided previously, during the comment period related to the rule's economic impact. When we submitted that testimony, we noted that it was not our intention to take up a new set of issues. We had already worked with our members and the industry to develop a list of items for discussion and we communicated through individuals on the code advisory committees who brought those issue forward.

All we will address then, are items that had been discussed and agreed to by one or both of the advisory committees and technical changes that were needed to make the code read properly. That isn't to say there isn't more, only that there will be another time and another code project to discuss them. That, and, as we mentioned, the hope for ongoing dialogue.

We submit the following concerns and clarifications:

1. **Draft Section 172, 173.** The first item of concern is the proposed repeal of SPS Table 382.41-1.
 - a. The removal of SPS Table 382.41-1 does not aid the plumber. In fact, it will make it more difficult for the plumber to determine the device or assembly for an installation not listed on the proposed Table. The proposed SPS Table 382.41-1 & Table 382.41-2 is an updated version of a current table already in the Appendix of SPS 382, but this table does not address the hydraulic conditions and pressure duration (backpressure/back siphonage &/or continuous/non-continuous). The original table is still needed. Removing it is not recommended.
 - b. The proposed changes to SPS Table 382.41-1 do not reflect the advisory committee proposed changes to this Table. Refer to the committee rule changes 6/22/2021.

2. **Draft Section 78.** The proposed draft does not include the advisory committee proposed changes to SPS Table 382.30-1.
 - a. The previous advisory committee proposed SPS Table 382.30-1 had several DFU and trap size changes that reflected current water usage of today's plumbing fixtures. These changes would have the potential to reduce drain and vent sizes, which in turn would lead to building cost savings. Refer to committee rule changes 4/3/2019.
 - b. The previous code package also included the "emergency floor drain" concept. Again, this idea could greatly reduce the sizes of drain and vent systems.
 - c. The previously proposed changes to SPS Table 382.30-1 would also make our code current with the International Plumbing Code, the Uniform Plumbing Code, and the National Standard Plumbing Code.
 - d. Refer to **Attachment #1** for proposed SPS Table 382.30-1.

3. **Draft Section 58, SPS Table 381.20-4.** We have questions regarding the adoption of certain standards as proposed for SPS 381.20.
 - a. Proposed SPS Table 381.20-4, Line 19, includes ASSE 1024. The ASSE 1024 standard, although originally created in 1979, was not adopted by DILHR, Commerce or DSPS. The adoption of ASSE 1024 does not reflect the advisory committee changes to SPS Table 381.20-4. Refer to committee rule changes 10/17/2018.
 - b. Proposed SPS Table 381.20-4, Line 20, includes ASSE 1032. The ASSE 1032 standard, although originally created in 1980, was not adopted by DILHR, Commerce or DSPS. The adoption of ASSE 1032 does not reflect the advisory committee changes to SPS Table 381.20-4. Refer to committee rule changes 10/17/2018.
 - c. Proposed SPS Table 381.20-4, Line 13. Although a few the ASSE standards being adopted identify the most current edition (ASSE 1003-2020, ASSE 1022-2021), the ASSE 1013-2011 and ASSE 1015-2011 are proposed, but ASSE 1013-2021 and ASSE 1015-2021 are the current editions. The draft would be adopting a decade old standard for no apparent reason. Recommend adopting the current edition of ASSE 1001-2021, ASSE 1012-2021, ASSE 1013-2021, ASSE 1015-2021, ASSE 1047-2021, ASSE 1048-2021, and ASSE 5000-2022e1.
 - d. Proposed SPS Table 381.20-4, Line 26. The proposed adoption of ASSE 1049 "Air Admittance Valves for Chemical Waste Systems" potentially conflicts with draft Section 87, SPS 382.31 (17m) (c) 4. "The AAV may not serve..." "A fixture serving a chemical waste system...". If the adoption of ASSE 1049 permits an AAV to be installed conforming to ASSE 1049, but not installed serving a chemical waste system, would the adding of a "Note" be advisable?

4. **Draft Section 149.** The proposed draft relating to SPS 382.40 (5) (bm) is significantly different than the advisory committee language.
 - a. Proposed draft reads, SPS 382.40 (5) (bm) "Temperature maintenance..." All public buildings as defined by s. 101.01 (12) Stats., except for those buildings 3 stories or less in height above grade plane..."
 - b. Refer to committee rule changes 9/28/2021. The committee proposed language reads, "For application to all commercial buildings. Inclusive of residential buildings with 3 tenants or more, which are 4 stories in height or greater above grade plan."
 - c. The proposed draft seems to exempt all "public buildings" 3 stories or less. Would not this exempt approximately 80% of all commercial buildings in Wisconsin from the water efficiency requirements?

5. A few of the proposed draft Sections may lead to confusion. Some would need modest editing. More importantly, these items will require code clarifications in the future, but could be addressed prior to the legislative review.
 - a. **Draft Section 216.** The draft proposes to repeal SPS Table 384-30-10, but SPS 384 (5) (a) states, "Pipe fittings shall conform to the pipe material standards listed in Table 384.30-10. The proposed draft in its current form does not amend this code section.
 - b. **Draft Section 58 & 200.** In the proposed draft, ASSE 1006, 1007 and 1009 are repealed (primarily because these standards are inactive). SPS 384.20 (5) (a) requires residential clothes washer to conform to ASSE 1007. SPS 384.20 (5) (e) 1. requires a residential dishwasher to conform to ASSE 1006. SPS 384.20 (5) (h) 1. requires a commercial food waste grinder to conform to ASSE 1006. These code sections are not being proposed for amending in the Draft.
 - d. **Draft Section 200.** The proposed draft for Table 384.11, Note "e." and "f." read, "Reduced pressure backflow preventers and... are not permitted for cross connection control." (Same statement is identified for the double check assembly. The RP valve assembly as well as the DC assembly are cross connection control assemblies. Delete Note "e" and "f." The advisory committee recommended to remove the notes. Refer to advisory committee rule changes 5/26/2021.
 - e. **Draft Section 163.** The proposed update includes moving the PVC Sch 80 Tables from the Appendix of SPS 382 to SPS 382.40 (creating SPS Table 382.40-12 & 382.40-13). This might suggest the use of PVC Sch 80 for water distribution piping; yet PVC Sch 80 is not identified as approved water distribution material for SPS Table 384.30-8 in the proposed draft. If the rationale is the approved use of PVC Sch 80 for water distribution piping with the limitation of SPS 384.30 (4) (e) 2. "Cold water distribution pipe installed underground...shall conform to one of the standards in Table 384.30-7 or 384.30-8...", would the adding of a "Note" be advisable?
 - f. **Draft Section 144.** The proposed draft language concerning SPS 382.40 (3) (e) 3. reads, "Materials for multipurpose shall be acceptable under NFPA 13D or ss. SPS 384.30 (4) (e) and SPS 384.30 (5)." NFPA 13D covers fire sprinklers systems for one and two-family dwellings. It includes stand-alone systems and multipurpose piping systems. NFPA 13D Table 5.2.2 permits black welded and seamless steel pipe, which is not an approved water distribution material as per SPS 384.30 (4) and (5). SPS 384.30 (4) and (5) permit water distribution material not listed or approved as specified in NFPA 13D Table 5.2.2 or Table 5.2.3.2. The existing wording of SPS 382.40 (3) 1. Note 1 seem to more in line with NFPA 13D 6.3.3 and 6.3.3.1.
 - g. **Draft Section 15.** The proposed draft language concerning SPS 305.92 (1) reads, "A person may obtain a license as a master plumber-restricted service by taking..." SPS 305.92 refers to master

plumber restricted license, both types of restricted, restricted service and restricted appliance. SPS 305.92 includes eight subsections' categories. To apply SPS 305.92 (1) to one of the two types of restricted license contradicts the structure of SPS 305.92. Do not add "service" to SPS 305.92 (1).

h. Refer to **Attachment #2** for additional recommended editing issues.

6. The advisory committee and a few plumbing contractors agree with the previous proposed draft: "Master Plan Review Exemption Proposal." **Refer to Attachment #3.** In light of ongoing discussions regarding plan review, we continue to believe that proposals such as these, where we look at ways to improve processes while still maintaining public health and safety, should be adopted. As always, we stand ready to work with the Department on other innovations regarding the plan review process.

In closing, it is the position of the Plumbing Heating Cooling Contractors Association of Wisconsin to support the code draft as amended by our recommendations above. We want to get this right and we want to get this done. Our amendments bring us closer to that objective.

Questions can be directed to me at the email and number that appears below.

Respectfully,



Jeffrey J Beiriger
Executive Director
PHCC Wisconsin Association
PO Box 833
Germantown, WI 53022
jeff@assocmgmtservices.com
414/331-2059

Attachment 1

Table 382.30-1

Drainage Fixture Unit Values By Fixture Type

Type of Fixture	<u>Non-Public Drainage Fixture Units (dfu)ⁿ</u>	<u>Public Drainage Fixture Units (dfu)</u>	<u>Minimum Trap Size (inches)</u>
Automatic Clothes Washers:			
Residential-type Pump Discharge	4 <u>3</u>		2
Commercial-type Pump Discharge		4	2
Commercial-type Gravity Discharge		a	a
Autopsy Table		h <u>b</u>	h <u>b</u>
Bathroom Group, includes water closet lavatory, bathtub or shower	6 <u>5</u>		
Bathtubs, all types ^{b c} <u>-</u>	2	2	1 1/2
Bedpan Washer		6	2
Beer Tap		1/2	1 1/4
Bidet	2	2	1 1/2
Bottle Cooler		1/2	1 1/4
Campsite Receptor		6 <u>5</u>	4
Coffee Maker		1/2	1 1/4
Cuspidor, fountain or dental		1	1 1/4
Dipper Well		1	1 1/4
Dishwasher, commercial type		e <u>d</u>	e <u>d</u>
Dishwasher, residential type	2	2	1 1/2
Drinking fountain	1/2	1/2	1 1/4
Exhaust Hood Washer		4	2
Floor Drain			
<u>Emergency (regardless of size)^e</u>	<u>1</u>	<u>1</u>	<u>f</u>
2 inch	2	2	2
3 inch	3	3	3
4 inch	4	4	4
Larger than 4 inch	4	4	d <u>f</u>
<u>Garage Catch Basin</u>	<u>4</u>	<u>4</u>	<u>4</u>
<u>Garage Catch Basin with additional drains</u>	<u>6</u>	<u>6</u>	<u>4</u>
Glass Filler		1/2	1 1/4
Glass Washer		2	1 1/2
<u>Gravity flow condensate or drip trays discharging to a receptor, 3/4" or smaller</u>		0.25	g
<u>Gravity flow condensate or drip trays discharging to a receptor, larger than 3/4" to 1"</u>		0.5	g
<u>Gravity flow condensate or drip trays discharging to a receptor, larger than 1"</u>		1	g
Health Care Fixtures:			
Clinic Sink		6	N/A

Exam / Treatment Sink		1	1 1/4
Sitz Bath		2	1 1/2
Ice Chest		1/2	1 1/2
Laundry Tray, 1 or 2 compartment	2	2	1 1/2
Lavatory	1	1	1 1/4
Lavatory, combination <u>multiple user 2 to 3 users per trap^h</u>		1	1 1/2
<u>Lavatory, combination multiple user 4 or more users per trap^h</u>		2	1 1/2
Manufactured Home	11		N/A
Refrigerated Food Display Case		1	1
Shower Stall:			
Residential	2		2
Public, individual		2	2
Public, group		2 per shower head	2
<u>Shower Drain (based on total flow rate through shower heads and body sprays)</u>			
<u>5.7 GPM or less</u>	<u>2</u>	<u>2</u>	<u>1 1/2</u>
<u>Greater than 5.7 GPM to 12.3 GPM</u>	<u>3</u>	<u>3</u>	<u>2</u>
<u>Greater than 12.3 GPM to 25.8 GPM</u>	<u>5</u>	<u>5</u>	<u>3</u>
<u>Greater than 25.8 GPM to 55.6 GPM</u>	<u>6</u>	<u>6</u>	<u>4</u>
Sinks ⁱ			
Bar, residential	1		1 1/4
Breakroom (single compartment)		1	1 1/2
<u>Breakroom (two compartment with or without food waste grinder)</u>		<u>2</u>	<u>1 1/2</u>
Cup		1/2	1 1/4
Factory wash, per set of faucets		4	1 1/2
Fountain wash-up		1	1 1/2
Fountain or Bar, 4 compartment or less		3	1 1/2
Food Waste Grinder, commercial 2 HP or less		2	fj
Food Waste Grinder, commercial 3 HP or more		3	fj
<u>Hand</u>		<u>1</u>	<u>1 1/4</u>
Laboratory		2	1 1/2
Laboratory, school		2	1 1/2
Classroom		1	1 1/4
Pack or Plaster		3	2
Residential, with or without food waste grinder	2		1 1/2
Restaurant, Scullery, pots and pans - 4 compartment or less		3	fj
Food rinsing, cleaning or thawing		3	2
Service Sink, Flushing Rim		6	3

Service Sink, 2 inch diameter <u>or smaller</u> , wall outlet ^k		2	2
Service Sink, 3 inch diameter <u>or larger</u> , wall outlet ^k		3	3
Service Sink, 2 inch diameter, floor outlet		2	2
Service Sink, 3 inch diameter, floor outlet		3	3
Shampoo Sink, barber or beauty parlor		2	1 1/2
Surgeon, wash up		3	1 1/2
Wash fountain, circular or semi-circular		2	1 1/2
Receptors of Indirect Wastes, gravity flow discharge:			
<u>Emergency (regardless of size)</u> ^l	<u>1</u>	<u>1</u>	<u>f</u>
1 1/4 inch receptor outlet diameter		1	1 1/4
1 1/2 inch receptor outlet diameter		2	1 1/2
2 inch receptor outlet diameter		3	2
3 inch receptor outlet diameter		4	3
4 inch receptor outlet diameter		6	4
Larger than 4 inch receptor outlet diameter		8	f j
<u>Commercial Laundry receptor (up to 75 pounds total washer capacity)</u>		<u>4</u>	<u>3</u>
<u>Commercial Laundry receptor (over 75 up to 250 pounds total washer capacity)</u>		<u>6</u>	<u>4</u>
<u>Commercial Laundry receptor (over 250 pounds total washer capacity)</u>		<u>8</u>	<u>4</u>
<u>Refrigerated food display case (any size)</u>		<u>2</u>	
Soda Dispenser		1/2	1 1/4
Sterilizers:			
Bedpan		4	2
Garbage can washer		3	3
Instrument or water		1	
Urinal (<u>1 gallon per flush or greater</u>)		2	2
Urinal (<u>less than 1 gallon per flush</u>)		<u>1</u>	<u>g m</u>
Water Closet (<u>greater than 1.6 gallons per flush</u>)	<u>4</u>	6	<u>g m</u>
<u>per flush</u>	<u>1</u>	<u>1</u>	<u>f</u>
<u>Water Closet (1.6 gallons per flush or less)</u>	<u>3</u>	<u>4</u>	<u>g m</u>

N/A = not applicable

- a. Commercial-style gravity discharge clothes washers must discharge to a laundry receptor per SPS 382.33 (9)c.3
- b. Trap size corresponds to the size of the drain outlet. Use the dfu value of the receptor serving the autopsy table.
- c. Includes foot, sitz and infant baths and regular bathtubs with or without showers or whirlpool circulation piping
- d. Based on discharge rates and number of outlets; a 4 inch diameter trap and drain pipe minimum recommended.

e. An Emergency Floor Drain is a floor drain that does not receive the discharge of any drain or indirect waste and that protects against damage from accidental spills, overflows and leakage.

f. Trap size corresponds to the size of the floor drain

g. The combined dfu load of all drains discharging to a receptor shall not exceed the dfu value of the receptor. The dfu value of the receptor shall be used for sizing the DWV piping.

h. Multiple user lavs shall include such fixtures as washfountains, fountain wash sinks, combination lavs and similar fixtures used for handwashing by multiple people at one time.

i. Sinks not specified in this table shall be assigned 1 dfu for 1 1/4" tailpiece, 2 dfu for 1 1/2" tailpiece and 3 dfu for 2" tailpiece.

fj. Trap size corresponds to the size of the drain outlet

k. May be floor or wall outlet

l. An Emergency Receptor is a receptor that does not receive the discharge of any drain or indirect waste and that protects against damage from accidental spills, overflows and leakage.

m. Trap size specified in referenced standards of s SPS 384.20

n. Any fixture which does not have a non-public DFU value listed and is used in a non-public setting shall use the public area DFU value

Attachment 2

SEC SPS 381 - 3875 DRAFT - Comments

Sections 4 - 26 Topic: SPS 302, 305 Draft pages: 10 - 17

- 2 SPS 305.003 (72) (Note) is repealed
Why eliminate Stat. 145 reference & not provide definition? [Cf. (52) "Pipelayer"; (55) "Plumbing apprentice"]
- 9 SPS 305.90 (1) (b) 2. a. and 3. (intro.) are amended to read:
Change is actually (1) (b) 2. a. & b. & c.
- 12 SPS 305.90 (1) (b) 4. a., and b. are created to read:
Is this excluding utility contractor from manufactured home community drain & water systems? [Cf. (1) (b) 1. e. to h.]
Inconsistent language between 305.90 (1) (b) 1. b. & 4. b.
- 15 SPS 305.92 (1) and (5) (b) are amended to read:
SPS 305.92 Covers both types of master plumber restricted license (service & appliance)
Do not add "service" in 305.92 (1)
- 21 SPS 305.97 (1) and (6) are amended to read:
Inconsistent language between 305.90 (1) (b) 4. b. & 305.97 (6)
- 22 SPS 305.98 (1) is amended to read:
305.97 (6) (b): "building sewers, sanitary" vs. 305.98 (1) "building sanitary sewers"

Sections 27 - 52 Topic: SPS 381.01 Draft pages: 17 - 23

- 34 SPS 381.01 (65m) and (66) are amended to read:
Definition of "cross connection control assembly" uses terms of assemblies in contrast to the terms in SPS 381.01 (79) & (189)
- 42 SPS 381.01 (172) is renumbered 381.01 (13e) and, as renumbered, amended to read:
(13e) delete "type of" [Cf. (18), (79), (108s), (204)]
- 43 SPS 381.01 (189) is amended to read:
(189) delete "type of" [Cf. (18), (79), (108s), (204)]

Sections 53 - 60 Topic: SPS 381.20 Draft pages: 23 - 35

- 58 SPS Tables 381.20-4, -5, -6, -7, -7e, -8, -9, -10, and -11 are repealed and recreated to read:
Table 381.20-4 Line 1. ASSE 1001-2017, why not adopt 1001-2021?
Table 381.20-4 Line 8. ASSE 1012-2009, why not adopt 1012-2021?
Table 381.20-4 Line 9. ASSE 1013-2011, why not adopt 1013-2021?
Table 381.20-4 Line 11. ASSE 1015-2011, why not adopt 1015-2021?
Table 381.20-4 Line 19. ASSE 1024, rationale for adopting ASSE 1024?
Table 381.20-4 Line 20. ASSE 1032, rationale for adopting ASSE 1032?
Table 381.20-4 Line 24. ASSE 1047-2011, why not adopt 1047-2021?
Table 381.20-4 Line 25. ASSE 1048-2011, why not adopt 1048-2021?
Table 381.20-4 Line 26. ASSE 1049? [Cf. Section 87. SPS 382.31 (17m) (c) 4. "a chemical waste system"]
Table 381.20-4 Line 39. ASSE 5000-2016, why not adopt 5000-2022e1?

Sections 61 - 76 Topic: SPS 382.20, 21, 22 Draft pages: 35 - 39

- 66 SPS 382.20 (1) (b) 1. and (c) are amended to read:
(1) (c) ASSE 1015 DC not listed [Cf. Table 382.20-1 Line 5.; Table 382.22-1]; Add ASSE 1015 DC
(1) (c) RPF & RPDF listed [Cf. Table 382.20-1 Line 5.; Table 382.22-1]; Remove RPF & RPDF

Sections 77 - 84 Topic: SPS 382.30 Draft pages: 39 - 43

- 77 SPS 382.30 (4) (a) 1. and 2. are amended to read:
Keep the "deleted" language and add the new language "may be less than the limits in Tables..."
- 78 Table SPS 382.30-1 is amended to read:
Proposed amended Table significantly less amendments than committee proposed
- 79 SPS 382.30 (10) (a) 2. c., (c) (intro.), and (d) (intro.) are amended to read:
Amended language "Capacity shall be based on one pump only" should apply to entire section for sizing sumps/pumps in regard to drains & vent

Sections 85 - 87 Topic: SPS 382.31 Draft pages: 43 - 46

- 85 SPS 382.31 (11) (a), (16) (d) and (e) are repealed and recreated to read:
Amended language regarding KS & AW should apply to back to back installations regardless of using common vent
- 87 SPS 382.31 (17) (d) and (17m) are created to read:
SPS 382.31 (17m) (c) 6. Wisconsin does not require a "stack vent" for two to four branch intervals (1985 requirement)
SPS 382.31 (17m) (e) 3. a., b., c., "See Note"; should it read "See par. (g) Note"?
A "Note" does not occur with (e).

Sections 88 - 94 Topic: SPS 382.32 Draft pages: 46 - 47

- 91 SPS 382.32 (3) (e) 1. and 2. are created to read:
SPS 382.32 (3) (e) 1. & 2. Advisory committee voted to amend Table 382.30-1 "Showers" minimum 1 1/2" trap
If 1 1/2" shower drain is permitted for "remodel", why is not permitted for new installations?

Sections 95 - 107 Topic: SPS 382.33 Draft pages: 48 - 51

- 96 SPS 382.33 (5) (b) (Note) is repealed.
Removed Note [SPS 325.01 (3)], but only if SPS 325.01 (3) is repealed [Cf. Committee notes]

Sections 108 - 113 Topic: SPS 382.34 Draft pages: 51 - 53

- 113 SPS 382.34 (15) (e) 1. (Note), (g), and (h) are created to read:
SPS 382.34 (15) (g) Vacuum relief "water treatment appliance"???
This requirement was previously within Water Reuse amendments [Draft April, 2019]

Sections 114 - 116 Topic: SPS 382.35 Draft pages: 53

- 114 SPS 382.35 (3) (a) (intro.) and (f) are amended to read:
SPS 382.35 (3) (f) "shall be located not 60 inches" [Cf. 8/24/21 Advisory Committee Notes
"the cleanout shall not exceed 60 inches"]

Sections 117 - 135 Topic: SPS 382.36, 382.365 Draft pages: 53 - 59

- 122 SPS Tables 382.36-1 and 382.36-3 are amended to read:
Table 382.36-1 & -3: 2" PVC 2.067 I.D. & 2" CI 1.96 ID: How were no values for CI derived?
[Cf. IPC-2021 Table 1106.2; UPC-2021 Table 1103.1; ASPE Plumbing Engineering Design Handbook, Chapter 1]
- 126 SPS 382.36 (8) (a) 5. and (b) 3. are created to read:
382.36 (8) (b) 3. should SPS 382.33 (8) (d) 6. be amended?
- 127 SPS 382.36 (10) is repealed and recreated to read:
SPS 382.36 (10) (c) "Controlled flow" created in 1985, removed 2004 [Register 587-2004], re-inserted 2023??
SPS 382.36 (10) (d) 6. "100-year, 24-hour" [100-year stormwater values identified in Code?]
Conversion factors of 26, 32.5 & 104 are based on 2-year, 24-hour stormwater event

Sections 136 - 138 Topic: SPS 382.37, 382.38 Draft pages: 59 - 60

Sections 139 - 163 Topic: SPS 382.40 Draft pages: 60 - 73

- 141 SPS 382.40 (3) (d) 1. a., (Note), b., and e., 4. and (e) 1. are amended to read:
SPS 382.40 (3) (d) 4. List of assemblies, doesn't include double check backflow prevention assemblies
[Cf. Section 65 & Section 76]
- 144 SPS 382.40 (3) (e) 3. to 5. are created to read:
SPS 382.40 (3) (e) 3. "shall be acceptable under NFPA 13D or ss. SPS 384.30 (4) & (5)
NFPA 13D includes stand-alone systems permitting materials not approved for water distribution systems
- 155 SPS 382.40 (7) (Note) and (d) 1. d. are created to read:
SPS 382.40 (7) Note: "See appendix for details..." Will the SPS 382 Appendix be updated with the Draft?
- 161 SPS 382.40 (8) (l) 5. and (m) are created to read:
SPS 382.40 (8) (m) 16. "shall be labeled in accordance with Table 382.40-1a"
Reference should be "Table 382.40-1p" [Cf. Section 141]

163 Tables SPS 382.40-12 through 15 are created to read:

Table 382.40-12 & 382.40-13 PVC Sch 80, Is PVC approved for water distribution piping?
[Cf. Current & Proposed Draft: Table 384.30-8] PVC Sch 80 is not listed as approved water distribution material]

Sections 164 - 179 Topic: SPS 382.41 Draft pages: 73 - 78

164 SPS 382.41 (1) (Note), (2) (a), (3) (b) 4. e., 5. (intro.) and a. are amended to read:

Draft reads: SPS 382.41 (3) (b) 4. e. "other than fire suppression fighting." should be: "fire suppression fighting."

SPS 382.41 (3) (b) 5. "shall may not be considered..."

The intent of the term "shall" is identifying DSPS declaration, not prohibition or permission

Also, SPS 382.40 (3) (b) 7. was not amended although identical language "shall not be considered..."

[Cf. Administrative Rules Procedures Manual-2022, Part 1, 1.08 (1) (b), page 19]

172 SPS Table 382.41-1 is repealed and recreated to read:

Table 382.41-1 as amended, does not reflect the committee proposals to amend Table 382.41

Amended Table provides significantly less info as previous Table [Hazard level, BP/BS & Cont/non-cont pressure]

Amended Table provides the impression that high hazard CCC items would not be acceptable

173 SPS Table 382.41-2 is repealed and recreated to read:

Table 382.41-1 as amended, does not reflect the committee proposals to amend Table 382.41

Amended Table provides significantly less info as previous [Hazard level, BP/BS & Cont/non-cont pressure]

175 SPS 382.41 (4) (g) 2. and (k) 2. are repealed.

SPS 382.41 (k) 2. Committee discussed identifying discharge not creating nuisance or providing drain or discharge prevention method selection

176 SPS 382.41 (4) (o) is created to read:

SPS 382.41 (4) (o) 3. "shall be installed below..." by exempting (4) (o) from (4) (b) 1., minimum 6" is not required?

178 SPS 382.41 (5) (d) 1m. is created to read:

Permitted for SPS 382.41 (5) (d) 1m. to contradict (5) (d) 1. without the usual phrase "except as provided..."?

Sections 180 - 192 Topic: SPS 382.50 Draft pages: 78 - 83

186 SPS 382.50 (3) (b) 4. is amended to read:

"may not exceed 3 feet..." Variety of required pipe lengths regarding same topic

[Cf. SPS 382.40 (5) (bm) 1.; 382.40 (8) (i) 5.; 382.50 (3) (b) 10.]

188 SPS 382.50 (3) (b) 5. and 6. (intro.) are amended to read:

SPS 382.50 (3) (b) 5. "pressure balanced, thermostatically controlled...0.5 gpm" [ASSE 1016, 1069 & 1070 comply?]

Sections 193 - 197 Topic: SPS 382.51, 382.60, 382.70, SPS 383.71 Draft pages: 83 - 85

Sections 198 - 220 Topic: SPS 384 Draft pages: 85 - 101

200 SPS Table 384.11 is repealed and recreated to read:

Original intent of Table 384.11 changed [Backflow prevention methods, devices & assemblies]
(See "method" in Table??)

Table 384.11 Updated the standards, but previous standard references in the code body:

SPS 384.20 (5) (a) Automatic clothes washers.

Residential type shall conform to ASSE 1007 [ASSE 1007 inactive standard]

SPS 384.20 (5) (b) Bathtubs, (c) Bidets

SPS 384.20 (5) (e) Dishwashing machines.

1. Residential...shall conform to ASSE 1006 [ASSE 1006 inactive standard]

SPS 384.20 (5) (h) Food waste grinders.

1. Commercial type shall conform to ASSE 1009 [ASSE 1009 inactive standard]

Table 384.11 Line 84: ASSE 1049 [Cf. Section 87 SPS 382.31 (17m) (c) 4. "fixture serving chemical waste"]

Table 384.11 Line 101: ASSE 1014 but removed from SPS 384.20 (6) (d)

Table 384.11 Line 106: Note "f": committee voted to repeal footnote

ASSE 1015 is a cross connection control assembly

Table 384.11 Line 109: Which committee line item proposed to adopt ASSE 1024?

Table 384.11 Line 112: Which committee line item proposed to adopt ASSE 1032?

Table 384.11 Line 115: ASSE 1001 occurs in Table twice

Line 99 Atmospheric vacuum breaker, Line 115 Pipe applied atmospheric vacuum breaker

Table 384.11 Line 118: Note "e": Committee voted to repeal footnote

RP assembly is a cross connection control assembly

Table 384.11 Note "g": Threaded joints shall...; should be "Threaded joints"

202 SPS 384.20 (5) (p) is repealed and recreated to read:

SPS 384.20 (5) (p) 2. "125° f." Throughout SPS 381-384 temperature is F, not lower case

216 Table SPS 384.30-10 is repealed.

Table SPS 384.30-10 is repealed [Cf. SPS 384.30 (5) (a) "...shall conform to Table 384.30-10..." is not amended

Attachment 3

PACC

Plumbing Plan Review Exemption Proposal

1. 381.01 Create a new definition: "Master Plan": A Master Plan is a method of plan review in which the submitter establishes design loads for current and future areas.
2. For new buildings with planned expansion, a Master Plan shall be created for the building with design calculated for each future tenant space. The Master Plan would be part of the original plumbing plan review.
3. For existing buildings, a Master Plan is optional. If a Master Plan is created for a building:
 - a. There shall be a review fee for a Master Plan.
 - b. The property owner shall be required to make available a copy of the Master Plan and provide it plumbing inspectors, and anyone who is performing alterations and / or additional plumbing work for that building.
 - c. The Master Plan must have the water calculations on the plans.
4. Future plumbing installations will be exempt from Plumbing Plan Review if a Master Plan has been approved and all of the following apply:
 - a. If the additional loads do not exceed the designated loads for that area.
 - b. Not more than 15 fixtures are added.
 - c. The facility is not a health care or related facility.
 - d. The installation does not include a grease interceptor.
 - e. The installation does not include a water re-use system.
5. If the project is exempt from plan review, an Exemption Form AAAA (sample attached) must be filled out and provided to the plumbing inspector, building owner, and the state. The building owner shall keep a copy of this form with the Master Plan. (\$50.00 – \$100.00 recommended).
6. If the additional loads exceed the design loads, then Plumbing Plan Review will be required for that space and the Master Plan is required to be updated.
7. The Plumbing Contractor and / or Master Plumber shall accept all responsibility / liability for proper sizing and installation of plumbing work installed as a part of the Exemption.
8. If the Exception is not used, all plumbing revisions shall be submitted for plumbing plan review.
9. The original plumbing contractor shall provide a means of flushing the main water supply system at a minimum velocity of 6 feet per second if the piping system is installed minimum of (1) nominal pipe size larger than the actual installed load. This contractor shall inform and educate the building owner of the installed flushing system.

Master Plan / Plan Review Exemption Form

Form AAAA

Building Address _____

Building owner _____

Building owner address _____

Master Plan ID # _____

Master Plan date _____

Area of alteration or additional work _____

Tenant name (if applicable) _____

Originally allowable loads for this area: _____ DFU
_____ WSFU _____ FM _____ FT

Actual loads added: _____ DFU
_____ WSFU _____ FM _____ FT

Installing Contractor _____

Address _____

Master Plumber _____

Date _____

I / We,

_____ (Contractor name) and

_____ (Master Plumber name)

hereby understand that we are fully responsible for the proper sizing and installation of the plumbing system within the area listed above and hereby accept all liability for errors and / or omissions

Signed

_____ (Contractor)

(Master Plumber)

Notarized??

From: [REDACTED]
To: [DSPS Admin Rules](#)
Subject: Plumbing code proposals and rulemaking - public comment period
Date: Thursday, January 26, 2023 9:41:50 AM

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Greetings,

I have been made aware today is the last day for public comment. I have reviewed the proposed language concerning the addition of language in relation to the items below and find no objection to the inclusion of terms and language related to personal hygiene devices covered by the reference standard below:

- standard ASME A112.4.2 / CSA B45.16 in Table 384.11
- definition of bidet sprayer

The goal of these additional references shall serve to facilitate local building authorities validation of compliance of referenced product to industry standards via product markings / labelling required by the standard and via 3rd party certification.

Thank you.

Regards,

Fernando Fernandez,

フェルナンド・フェルナンデス

Sr. Director Codes and Standards

TOTO USA, Inc.

web: www.totousa.com

Confidentiality Notice:

The information in this email is confidential and may be legally privileged. It is intended solely for the addressee. Access to this email by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. If you are not the intended addressee please contact the sender and dispose of this email.

From: Software-Notification@legis.wisconsin.gov
To: [DSPS Admin Rules](#)
Cc: [REDACTED]
Subject: Public comment on CR 23-006
Date: Tuesday, March 14, 2023 5:19:28 PM

Name: Bruce Meiners
[REDACTED]

Organization:

Comments: Published Proposed Code change 382.50(3)(b)6. reads.

6. Hot water distribution systems may not include a heat recovery system, and shall be installed and maintained to provide bacterial control disinfection by one of the following methods: a method approved by the Wisconsin department of natural resources for public drinking water. SECTION 189. SPS 382.50 (3) (b) 6. a., b., and c. are repealed.

Repealing 382.50(3)(b)6. a., b., and c. are repealing thermal disinfection and also relying on the DNR for sections that I believe cannot be easily found if at all. The proposed code language published is not what was approved at code council.

382.50(3)(b)6. Should read per code council meeting.

382.50(3)(b)6. Hot water distribution systems may not include a heat recovery system, and shall be installed and maintained to provide disinfection by one of the following methods:

a. Water stored and circulation initiated at a minimum of 140° and with a return of a minimum of 124°.

bm. Chlorine Dioxide

d. 0.5 Chlorine

e. Monochloramine

f. Another Disinfection system approved by the department or utilizing disinfectant provided by the municipality per individual site approval by the department.



Hearing Date
City

PUBLIC HEARING TESTIMONY AND REGISTRATION INFORMATION

Name (Print) <i>JEFFREY BEIRIGER</i>		Signature <i>[Handwritten Signature]</i>	
Address (Street or Box Number) <i>800 5th ST</i>		City <i>MENASHA</i>	State <i>WI</i>
		Zip Code <i>54952</i>	
Representing (Identify Business, Association, Group or Self) <i>PHCC Wisconsin Association</i>		Small Business? * <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

* "Small Business" means having 25 or fewer full-time employees or less than \$5 million gross annual sales.

If you wish to speak for the record, please indicate:

- In favor of proposed rules. *(AS AMENDED BY OUR LETTER/TESTIMONY)*
- Against proposed rule.
- To provide information to the Department; neither for nor against.

If you do not wish to speak, please indicate how you wish to register:

- In favor of proposed rules.
- Against proposed rule.
- For information only.

Additional Comments:



Hearing Date
City

PUBLIC HEARING TESTIMONY AND REGISTRATION INFORMATION

Name (Print) <i>JOSEPH ZOULEK</i>	Signature <i>[Handwritten Signature]</i>		
Address (Street or Box Number) <i>2969 NOSTALGIC DR</i>	City <i>HUBERTUS</i>	State <i>WI</i>	Zip Code <i>53033</i>
Representing (Identify Business, Association, Group or Self) <i>PHCC OF WISCONSIN PLUMBING CONTRACTORS</i>	Small Business? * <input type="checkbox"/> YES <input type="checkbox"/> NO		

* "Small Business" means having 25 or fewer full-time employees or less than \$5 million gross annual sales.

If you wish to speak for the record, please indicate:

- In favor of proposed rules. *WITH AMENDMENTS*
- Against proposed rule.
- To provide information to the Department; neither for nor against.

If you do not wish to speak, please indicate how you wish to register:

- In favor of proposed rules.
- Against proposed rule.
- For information only.

Additional Comments:



Hearing Date	3/27/2023
City	

PUBLIC HEARING TESTIMONY AND REGISTRATION INFORMATION

Name (Print)	Signature		
Dean Peterson	[Signature]		
Address (Street or Box Number)	City	State	Zip Code
W 9234 Kent	Raynette		53955
Representing (Identify Business, Association, Group or Self)	Small Business? *		
Industries	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

* "Small Business" means having 25 or fewer full-time employees or less than \$5 million gross annual sales.

If you wish to speak for the record, please indicate:

- In favor of proposed rules.
- Against proposed rule.
- To provide information to the Department; neither for nor against.

If you do not wish to speak, please indicate how you wish to register:

- In favor of proposed rules.
- Against proposed rule.
- For information only.

Additional Comments: