

4755 East Philadelphia Street Ontario, California – USA 91761-2816

Ph: 909.472.4100 | Fax: 909.472.4150 http://www.iapmo.org

May 21, 2024

VIA EMAIL ONLY: damonpremer@mac.com

Damon Premer ACCO/All Area Plumbing 2554 Armacost Ave Los Angeles, CA 90064

Re: IAPMO - WATER EFFICIENCY & SANITATION STANDARD

Dear Mr. Premer:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

As indicated by the letter ballot, Item #132 PC1A achieved the necessary 67% affirmative of returned ballots. In addition, the negative vote and comment was re-circulated to the TC in order to provide an opportunity to reaffirm, respond or change their vote before the closing date of the ballot.

Item #132 PC1A achieved the necessary 67% affirmative vote of returned ballots (received 16 affirmatives).

28 Members eligible to vote -4 not returned -1 abstention $= 23 \times 2/3 = 16$ affirmatives required.

Furthermore, in accordance with Section 8.1 of the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Item #132 PC1A was sent for public review and published in the ANSI Standards Action Report on March 15, 2024, with a deadline of April 29, 2024. One public comment was received to further modify the language. This public comment was balloted to the Technical Committee on April 30, 2024 as Item #132 PC1B. As indicated by the letter ballot, Item #132 PC1B did not achieve the necessary 67% affirmative of returned ballots.

Item #132 PC1B did not achieve the necessary 67% affirmative vote of returned ballots (received 15 affirmatives).

28 Members eligible to vote -4 not returned -1 abstention $=23 \times 2/3 = 16$ affirmatives required.

In accordance with the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Section 5.6(c)(1), your negative vote for Item #132 PC1A is a previously considered negative vote and, therefore, is considered resolved. I have attached the final letter ballot for your review.

Please note you have the right to appeal such action or inaction in accordance with Section 9.1 of the IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard.



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Thank you for your continued support of the development of the 2023 Water Efficiency and Sanitation Standard.

Sincerely,

Hugo Aguilar, P.E.

Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE	I concur with Laura (and others' statements) in terms of the AAV's
	W/COMMENT	intended use.

Ballot Name:	Item # 132 PC1A		
Total Votes:	28		
Vote Summary			
Option	Count	Percent	
AFFIRMATIVE	16	69.57%	
NEGATIVE W/COMMENT	7	30.43%	
ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: eosann@nrdc.org

Edward Osann Natural Resources Defense Council (NRDC) 1152 15th Street, NW Washington, DC 20005

Re: IAPMO – WATER EFFICIENCY & SANITATION STANDARD

Dear Mr. Osann:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

As indicated by the letter ballot, Item #132 PC1A achieved the necessary 67% affirmative of returned ballots. In addition, the negative vote and comment was re-circulated to the TC in order to provide an opportunity to reaffirm, respond or change their vote before the closing date of the ballot.

Item #132 PC1A achieved the necessary 67% affirmative vote of returned ballots (received 16 affirmatives).

28 Members eligible to vote -4 not returned -1 abstention $= 23 \times 2/3 = 16$ affirmatives required.

Furthermore, in accordance with Section 8.1 of the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Item #132 PC1A was sent for public review and published in the ANSI Standards Action Report on March 15, 2024, with a deadline of April 29, 2024. One public comment was received to further modify the language. This public comment was balloted to the Technical Committee on April 30, 2024 as Item #132 PC1B. As indicated by the letter ballot, Item #132 PC1B did not achieve the necessary 67% affirmative of returned ballots.

Item #132 PC1B did not achieve the necessary 67% affirmative vote of returned ballots (received 15 affirmatives).

28 Members eligible to vote -4 not returned -1 abstention $=23 \times 2/3 = 16$ affirmatives required.

In accordance with the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Section 5.6(c)(1), your negative vote for Item #132 PC1A is a previously considered negative vote and, therefore, is considered resolved. I have attached the final letter ballot for your review.

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Sincerely,

Hugo Aguilar, P.E.

Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Osann, Edward	NEGATIVE	I concur with Laura Allen's statement.
	W/COMMENT	

Ballot Name:	Item # 132 PC1A		
Total Votes:	28		
Vote Summary			
Option	Count	Percent	
AFFIRMATIVE	16	69.57%	
NEGATIVE W/COMMENT	7	30.43%	
ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: gary@garykleinassociates.com

Gary Klein Gary Klein and Associates, Inc. 11891 Autumn Sunset Way, Suite A Rancho Cordova, CA 95742-8009

Re: IAPMO - WATER EFFICIENCY & SANITATION STANDARD

Dear Mr. Klein:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

As indicated by the letter ballot, Item #132 PC1A achieved the necessary 67% affirmative of returned ballots. In addition, the negative vote and comment was re-circulated to the TC in order to provide an opportunity to reaffirm, respond or change their vote before the closing date of the ballot.

Item #132 PC1A achieved the necessary 67% affirmative vote of returned ballots (received 16 affirmatives).

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Furthermore, in accordance with Section 8.1 of the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Item #132 PC1A was sent for public review and published in the ANSI Standards Action Report on March 15, 2024, with a deadline of April 29, 2024. One public comment was received to further modify the language. This public comment was balloted to the Technical Committee on April 30, 2024 as Item #132 PC1B. As indicated by the letter ballot, Item #132 PC1B did not achieve the necessary 67% affirmative of returned ballots.

Item #132 PC1B did not achieve the necessary 67% affirmative vote of returned ballots (received 15 affirmatives).

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In accordance with the *IAPMO Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard*, Section 5.6(c)(1), your negative vote for Item #132 PC1A is a previously considered negative vote and, therefore, is considered resolved. I have attached the final letter ballot for your review.

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Sincerely,

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Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Klein, Gary	NEGATIVE W/COMMENT	I am very confused. Looking back over the voting record for this item, Figure F 301.1(6) and Figure F 301.1(7) were overwhelmingly approved by the full committee during our last meeting. The AAV's shown in these figures are for a portion of the gray water drainage system that is not intended to be connected to the rest of the sanitary drainage system. I would be surprised if the question of whether this could be allowed in WE•Stand wasn't discussed at length in our meeting. Since it had such overwhelming support, we appear to have decided it was acceptable to include it.

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ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: kent.sovocool@snwa.com

Kent Sovocool Southern Nevada Water Authority P.O. Box 99956 Las Vegas, NV 89193-9956

Re: IAPMO – WATER EFFICIENCY & SANITATION STANDARD

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

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Sincerely,

Hugo Aguilar, P.E.

Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Sovocool, Kent	NEGATIVE	I agree with Laura on this.
	W/COMMENT	

Ballot Name:	Item # 132 PC1A		
Total Votes:	28		
Vote Summary			
Option	Count	Percent	
AFFIRMATIVE	16	69.57%	
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ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: laura@greywateraction.org

Laura Allen Greywater Action 2140 Four Oaks Grange Road Eugene, OR 97405

Re: IAPMO - WATER EFFICIENCY & SANITATION STANDARD

Dear Ms. Allen:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

As indicated by the letter ballot, Item #132 PC1A achieved the necessary 67% affirmative of returned ballots. In addition, the negative vote and comment was re-circulated to the TC in order to provide an opportunity to reaffirm, respond or change their vote before the closing date of the ballot.

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Sincerely,

Hugo Aguilar, P.E.

Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Allen, Laura	NEGATIVE W/COMMENT	I think there is some confusion with how the system works and what the AAV is being used for. (I think the submitter of the public comment is misreading the diagram, since the graywater side of the diverter valve is totally isolated/separate from the DWV system, and there is a vent through the roof, as required by code).
		I wonder if we could modify the labels to address this? The piece doesn't have to be an AAV (that is just the most common thing that is used). What if we called this a "vacuum relief device" or valve?
		Here is a bit more about the system: The AAV is not used as a vent, as this portion of the gray water system is isolated from the building DWV system. It is only connected to the appliance, the washing machine. This seemingly small modification would create unfixable issues for this particular gray water system.

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ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: markuslenger@cleanblu.com

Markus Lenger CleanBlu Innovations Inc 34605 Via Catalina Capistrano Beach, CA 92624

Re: IAPMO – WATER EFFICIENCY & SANITATION STANDARD

Dear Mr. Lenger:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

As indicated by the letter ballot, Item #132 PC1A achieved the necessary 67% affirmative of returned ballots. In addition, the negative vote and comment was re-circulated to the TC in order to provide an opportunity to reaffirm, respond or change their vote before the closing date of the ballot.

Item #132 PC1A achieved the necessary 67% affirmative vote of returned ballots (received 16 affirmatives).

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Sincerely,

Hugo Aguilar, P.E.

Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
Lenger, Markus	NEGATIVE	I concur with Laura Allen.
	W/COMMENT	

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Total Votes:	28		
Vote Summary			
Option	Count	Percent	
AFFIRMATIVE	16	69.57%	
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Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
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Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
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Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
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Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
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AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote



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May 21, 2024

VIA EMAIL ONLY: pat@recodenow.org

Pat Lando Recode 6607 SE Scott Dr Portland, OR 97215

Re: IAPMO – WATER EFFICIENCY & SANITATION STANDARD

Dear Mr. Lando:

I am writing to inform you that we have received your negative ballot for Item #132 PC1A based on the 2023 Water Efficiency and Sanitation Standard Report on Comments.

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Sincerely,

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Ballot Name:	Item #132 Comment 1A	
Voter Name	Vote	Comments
		Comments 1st comment: I get it. We did talk about this during the voting. The AAV is really a 'belts and suspenders' device operating on the grey water side of the system whereas the plumbing stack venting is working to vent the building side (as per WE•Stand and main code). 2nd comment: As I am looking at the entire proposal again, I think that the issue that is giving people heartburn is Figure F 301.1(7). Yes? As I read the diagram, I think that: 1. The title should remove the word "drainage" to prevent confusion as to including this work under the plumbing drainage section. This is a "Gray Water System" starting from the clothes washer box, passing the washer connection and out of the structure. So, we should call it a "Gray Water System — Clothes Washer Gray Water System Where Gray Water Is Run Through Crawl Space." 2. As for the AAV, I see what it is doing and think that an irrigation
		"king drain valve, or frost protection valve" would do the same thing, but overall, I don't think that the system needs either one. I think that the piping is just an extension of the washer hose, and it doesn't need any special valve. Washing machines are protected with a backwater valve and would throw an error code if it were blocked from draining. Being a gray water system, all of these parts and connections should fall under the gray water section of the WE•Stand. If we allow the AAV or other devices, it should be included in the code (obviously). However, I would hate to throw out this entire proposal based on that single fitting which isn't part of the plumbing system.

Ballot Name:	Item # 132 PC1A		
Total Votes:	28		
Vote Summary			
Option	Count	Percent	
AFFIRMATIVE	16	69.57%	
NEGATIVE W/COMMENT	7	30.43%	
ABSTAIN W/COMMENT	1		
Voter Name	Vote		
Braband, Steven	AFFIRMATIVE	Thompson, Kyle	AFFIRMATIVE
Campbell, Charles	AFFIRMATIVE	White, Charles	AFFIRMATIVE
Cudahy, Michael	AFFIRMATIVE	Allen, Laura	NEGATIVE W/COMMENT
Granger, Brian	AFFIRMATIVE	Klein, Gary	NEGATIVE W/COMMENT
Kendzel, Jim	AFFIRMATIVE	Lando, Pat	NEGATIVE W/COMMENT
Kuchta, Todd	AFFIRMATIVE	Lenger, Markus	NEGATIVE W/COMMENT
Layton, Rick	AFFIRMATIVE	Osann, Edward	NEGATIVE W/COMMENT
Majerowicz, James	AFFIRMATIVE	Premer, Damon	NEGATIVE W/COMMENT
Mann, David	AFFIRMATIVE	Sovocool, Kent	NEGATIVE W/COMMENT
Moscovich, Avishai	AFFIRMATIVE	Koeller, John	ABSTAIN W/COMMENT
Potts, Beverly	AFFIRMATIVE	Crawford, Shawn	Did not vote
Sewell, Robert	AFFIRMATIVE	Lansing, John	Did not vote

AFFIRMATIVE

AFFIRMATIVE

Smith, Billy

Tabakh, Amir

Strahl, Tracy

Williams, Jeff

Did not vote