



March 10, 2017

Steve Nastruz
Seattle/King County Health Department
19600 20th Avenue NW
Shoreline, WA 98177

Re: IAPMO Standards Council Decision
TIA UPC-002-15
Decision date: March 10, 2017**
Uniform Plumbing Code – Sections 205.0, 911.0 – 911.4.1.2

Dear Mr. Nastruz:

I am transmitting to you herewith the following decision of the Standards Council. At its teleconference meeting on March 9, 2017, the Standards Council considered your request for the issuance of proposed TIA UPC-002-15 in the 2015 edition of the *Uniform Plumbing Code*. The proposed Tentative Interim Amendment requested a new definition to Section 205.0, and amendments to Section 911.0 as follows:

205.0

Circuit Vent – The vent that connects to a horizontal drainage branch and vents two traps to a maximum of eight traps connected into a battery of fixtures.

911.0 Circuit Venting.

911.1 Circuit Vent Permitted. A maximum of eight ~~fixtures~~ floor-outlet water closets, showers, bathtubs, or floor drains connected to a horizontal branch ~~drain~~ shall be permitted to be circuit vented. Each ~~fixture drain trap arm~~ shall connect horizontally to the horizontal branch being circuit vented in accordance with Table 1002.2. The horizontal branch ~~drain~~ shall be classified as a drain and a vent from the most downstream fixture drain trap arm connection to the most upstream fixture drain trap arm connection to the horizontal branch.

Exception: Back-outlet water closets shall be permitted to be circuit vented provided that no floor-outlet fixtures are connected to the same horizontal branch.

~~**911.1.1 Multiple Circuit-Vented Branches.** Circuit-vented horizontal branch drains are permitted to be connected together. Each group of a maximum of eight fixtures shall be considered a separate circuit vent and shall be in accordance with the of this section.~~

911.2 Circuit Vent Size and Connection. The circuit vent size shall be in accordance with Table 703.2 according to the number of circuit vented fixtures connected to the horizontal branch but shall be not less than 2 inches (50 mm) in diameter and the connection shall be located between the two most upstream fixture drains. The vent shall connect to the horizontal branch on the vertical between the two most upstream trap arms. The circuit vent pipe shall not receive the discharge of a soil or waste.

911.2.1 Multiple Circuit Vents. When multiple circuit vents are interconnected according to Section 911.4.1, each individual circuit vent shall be sized according to Section 911.2. The vent pipe connecting each circuit vent shall be sized according to Table 703.2.



~~**911.3 Slope and Size of Horizontal Branch.** The slope of the vent section of the horizontal branch drain shall be not more than 1 inch per foot (83.3 mm/m). The entire length of the vented section of the horizontal branch drain shall be sized for the total drainage discharge to the branch.~~

~~**911.3.1 Size of Multiple Circuit Vent.** Multiple circuit vented branches shall be permitted to connect on the same floor level. Each separate circuit vented horizontal branch that is interconnected shall be sized independently in accordance with Section 911.3. The downstream circuit vented horizontal branch shall be sized for the total discharge into the branch, including the upstream branches and the fixtures within the branch.~~

~~**911.4.1 911.3 Relief Vent.** A 2 inch (50 mm) relief vent shall be provided for circuit-vented horizontal branches receiving the discharge of four or more water closets and when connecting to a drainage stack that receives the discharge of soil or waste from upper horizontal branches.~~

~~**911.4.1 911.3.1 Connection and Installation.** The relief vent shall connect to the horizontal branch drain between the stack and the most downstream fixture drain trap arm of the circuit vent. The relief vent shall be installed on the vertical to the horizontal branch.~~

~~**911.4.2 911.3.2 Fixture Drain or Branch.** The relief vent is permitted to be serve as a fixture drain or fixture branch for a fixture located within the same branch interval as the circuit-vented horizontal branch. Fixtures The discharging to a relief vent shall be one or two fixture unit fixtures but shall not exceed a total of 4 fixture units.~~

~~**911.4 Slope and Size of Horizontal Branch.** The vented section of the horizontal branch shall be uniformly sloped and not more than 1 inch per foot (83.3 mm/m). The entire length of the vented section of the horizontal branch shall be sized for the total drainage discharge to the branch according to Table 703.2.~~

~~**911.4.1 Multiple Circuit-Vented Branches.** Circuit-vented horizontal branches are permitted to be connected together. Each group of a maximum of eight fixtures shall be considered a separate circuit vent and shall be in accordance with Section 911.4.1.1 and Section 911.4.1.2.~~

~~**911.4.1.1 Size of Parallel Horizontal Branches.** Parallel horizontal circuit vented branches shall be permitted to connect on the same floor level. Each separate circuit-vented horizontal branch that is interconnected shall be sized independently in accordance with Section 911.4.~~

~~**911.4.1.2 Size of Continuous Horizontal Branches.** Two or more circuit vented systems continuous on the same horizontal branch shall be uniformly sized for the total discharge into the branch.~~

~~**911.5 Additional Fixtures.** Fixtures, other than the circuit-vented fixtures, are permitted to discharge to the horizontal branch drain. Such fixtures shall be located on the same floor as the circuit-vented fixtures and shall be either individually or common vented.~~

Prior to the March 9 teleconference, the proposed TIA was balloted through the Plumbing Technical Committee in accordance with the Regulations Governing Committee Projects to determine if there existed the necessary three-fourths majority support on technical merit and emergency nature to establish the recommendation for issuance. The ballot failed on both accounts and subsequently came to the IAPMO Standards Council, as prescribed by the Regulations.

Upon review of the full record, the Council hereby rejects the proposed TIA. The Council agrees with the conclusion reached by the Plumbing Technical Committee in finding the absence of an emergency nature.

IAPMO Standards Council Decision
TIA UPC-002-15
Decision date: March 10, 2017**
Uniform Plumbing Code – Sections 205.0 and 911.0 – 911.4.1.2

Sincerely,



Gabriella Davis
Secretary, Standards Council

CC: Monte Bogatz, Executive VP & General Counsel
Lynne Simnick, Sr VP Code Development
IAPMO Standards Council
Members of the Plumbing TC

****NOTE:** Participants in IAPMO's codes and standards making process are advised that limited review of this decision may be sought from the IAPMO Board of Directors. For the rules describing the available review and the method for petitioning the Board of Directors for review, please consult Section 1-7 of the *IAPMO Regulations Governing Committee Projects* and the *IAPMO Regulations Governing Petitions to the Board of Directors from Decisions of the Standards Council*. **Notice of the intent to file such a petition must be submitted to the Petitions Clerk of the Board of Directors within 15 calendar days of the Date of Decision noted in the subject line of this letter.** As this document is an American National Standard (ANS), any persons who have directly and materially affected interests by this decision have the right to appeal to ANSI in accordance with ANSI procedures.

IAPMO Regulations Governing Committee Projects
Section 1-7

1-7 Petitions to the Board of Directors.

1-7.1 General. The Standards Council has been delegated the responsibility for the administration of the codes and standards development process and the issuance of Documents. However, where extraordinary circumstances requiring the intervention of the Board of Directors exist, the Board of Directors may take any action necessary to fulfill its obligations to preserve the integrity of the standards development process. Anyone seeking such intervention of the Board of Directors may petition the Board of Directors concerning Standards Council action on any matters. Such petitions shall be filed and processed in accordance with the Regulations Governing Petitions to the Board of Directors from Decisions of the Standards Council.

1-7.2 Notice of Intent to File the Petition. Anyone wishing to petition the Board of Directors concerning an Standards Council action related to the issuance of a document, shall file a Notice of Intent to File a Petition within 15 days following the Standards Council action. A Standards Council action related to the issuance of a document includes any action of the Council that issues or returns a Document or that affects the text of a Document. Petitions concerning other Standards Council actions shall be filed within a reasonable period of time.

1-7.3 Effect of Filing. The filing of a Petition will not serve to stay the effective date of a Document or a Tentative Interim Amendment unless the Executive Director of the Association or the Board of Directors acts, pursuant to 4-7.2 or 5-6, to delay the effective date. Any Petition pending at the time a Document or Tentative Interim Amendment becomes effective will be treated as a Petition to withdraw the Document or Tentative Interim Amendment.

1-8 Use of Visual Aids and Demonstrations Before the Standards Council or Board of Directors. The policy for the use of visual aids and physical demonstrations to the Standards Council and Board of Directors shall be the same as that required for TCCs, TCs, and Task Groups, in accordance with 3-3.3.3(e) and 3-3.3.3(f).

**IAPMO Regulations Governing Petitions to the Board of Directors
from Decisions of the Standards Council**

ADOPTED BY THE IAPMO BOARD OF DIRECTORS SEPTEMBER 4, 2000. Amended in January 2007.

Section 1 Scope of and Authority for these Regulations.

(a) These regulations have been issued by the Board of Directors pursuant to its authority under Article 5, 6 and 8 of the IAPMO Bylaws.

(b) These regulations set forth the procedures to be used for the filing and processing of all petitions to the Board of Directors filed pursuant to 1-7 of the Regulations Governing Committee Projects.

(c) The Board of Directors can amend these regulations from time to time and waive or supplement, in whole or in part, at any time or times at its discretion.

(d) For the purposes of these regulations, the Standards Council Secretary, or such other person as the Chair of the Board of Directors may appoint, shall act as a petitions clerk.

Section 2 Subcommittees of the Board of Directors. Unless the Board of Directors otherwise orders, the authority to consider and make recommendations on the disposition of a petition by the Board of Directors shall be delegated to a subcommittee of the Board of Directors, which shall be appointed, in accordance with 2.1 of these regulations. Subcommittees shall be appointed by the Chair of the Board of Directors.

2-1 Composition of Subcommittees. Subcommittees shall consist of three or more members of the Board of Directors. The criteria for selection and appointment of subcommittee members shall be as follows:

(a) A subcommittee member shall be a person who can decide the petition on the merits in an impartial manner.

(b) A subcommittee member shall not have any conflict of interest. (A conflict of interest is defined as any situation in which a decision on a petition could substantially and materially affect the member's financial or business interest.)

(c) Each subcommittee member shall, to the extent practicable, represent diverse interests within the association.

In making a decision of whether or not to serve on a subcommittee, the member may consult with the IAPMO general counsel.

Section 3 The Scope of Review. The petitioner shall generally confine the argument in the petition to matters that were presented below and shall not raise any new matters that could have but were not presented within the standards development process. A petition to the Board of Directors shall not be regarded as simply another opportunity to reargue a position that was rejected by the Standards Council. In considering a petition, the subcommittee shall give due deference to the judgment of the Standards Council and shall not intervene unless it can be demonstrated that extraordinary circumstances exist requiring the Board of Director's intervention to protect the integrity of the standards development process.

Section 4 The Record. In its consideration of the petition, the subcommittee shall have before it the entire record that was before the Standards Council, as well as all proceedings and decisions of the Standards Council on the issue. In addition, the subcommittee may consult any other records of the association that it deems pertinent to the issue, and the subcommittee may seek technical assistance from staff, the technical committee, or any other source or persons that it deems appropriate.

Section 5 Notice of Intent to File the Petition. Anyone wishing to petition the Board of Directors concerning a Standards Council action related to the issuance of a document, shall file a Notice of Intent to File a Petition within 15 days following the Standards Council action. A Standards Council action related to the issuance of a document includes any action of the Council that issues or returns a document or that affects the text of a document. Petitions concerning other Standards Council actions shall be filed within a reasonable period of time.

Section 6 Filing and Contents of the Petition.

(a) Within 15 days following the receipt of the notice of intent to file, or within such other time as the petitions clerk may allow, the petitioner shall file the petition together with 20 copies. The petition shall be no more than 10 pages in length and shall contain, in separately denominated sections, the following:

(1) Name, affiliation, and address of the petitioner;

(2) Statement identifying the particular Standards Council action to which the petition relates;

(3) Argument setting forth the grounds for the petition and, in particular, addressing why there exist extraordinary circumstances requiring the intervention of the Board of Directors (see the preceding Section 3 and 1-7 of the Regulations Governing Committee Projects); and

(4) Statement of the precise relief requested.

(b) Any part of the record related to the standards development process that is referenced or discussed in the petition should be clearly cited in the petition using available markings such as the title, author, date, and page of the record. Since the full record will be available to the subcommittee during its review, attachments and appendices shall not accompany the petition, unless express permission has been obtained from the petitions clerk.

Section 7 Consideration of the Petition.

7-1 Initial Review. The petitions clerk may, at his or her discretion, arrange for initial review of the petition by meeting, correspondence, or telephone conference. If upon such initial review of the petition and any relevant portions of the record, the subcommittee determines that the petition has no merit, it may dismiss the petition.

7-2 Full Review. If initial review is not conducted, or, if upon such review, the subcommittee determines that further review is warranted, it shall afford the opportunity for responses to be filed by interested parties. Responses, together with 20 copies, shall be filed within 15 days or within such other time as the petitions clerk may allow.

(a) Responses shall be no more than 10 pages in length and shall contain, in separately denominated sections, the following:

(1) Name, affiliation, and address of the respondent;

(2) Statement identifying the petition to which the response relates and stating whether the respondent supports or opposes the petition; and

(3) Argument setting forth the grounds for opposing or supporting the petition and, in particular, addressing why there does or does not exist extraordinary circumstances requiring the intervention of the Board of Directors (see the preceding Section 3 and 1-7 of the Regulations Governing Committee Projects).

(b) Any part of the record related to the standards development process that is referenced or discussed in a response should be clearly cited in the response using available markings such as the title, author, date, and page of the record. Since the full record will be available to the subcommittee during its review, attachments and appendices shall not accompany the response, unless express permission has been obtained from the petitions clerk.

(c) So as to avoid unnecessary repetition and duplication of effort, parties are encouraged to file joint responses where possible and appropriate.

(d) Unless a hearing has been requested and granted by the subcommittee (see Section 8), the subcommittee shall, either by meeting or telephone conference, review and render a decision on the petition based on the written submissions of the parties and the record before it.

Section 8 Requests for Hearings. If the petitioner requests a hearing on the petition and that hearing is granted, the petitioner shall be assessed a filing fee of \$2,500 to be posted following the granting of the request. This fee may be reduced or waived by the Executive Director upon application of the petitioner if good cause for reducing or waiving the fee is presented. If a hearing is granted, the Procedures for Hearings shall be followed.

Section 9 Waiver of Regulations. Any of the deadlines or requirements set forth in these regulations may be waived by the subcommittee upon application of the petitioner or any other party for good cause shown, or in the discretion of the subcommittee.

Section 10 Subcommittee Report to the Board of Directors. The subcommittee shall file with the Board of Directors a written report concerning each petition that it has determined.