

## 2025 WESand ROP Circulation of Comments

Ballot Name:	WESand Item #004	
Voter Name	Vote	Comments
Cudahy, Michael	NEGATIVE w/comment	I agree with Kyle Thompson. Codes should approach definitions carefully. We are not building a dictionary.
Kendzel, Jim	NEGATIVE w/comment	A definition is not needed because the term is self-explanatory.
Mann, David	NEGATIVE w/comment	While I agree that this definition is not required, I am bothered by the fact that the negative comments refer to the WESand as a code. The WESand is not a code; it is a standard.
Ribbs, Phil	NEGATIVE w/comment	A definition is not needed because the term is self-explanatory.
Thompson, Kyle	NEGATIVE w/comment	<p>Codes are not intended to serve as encyclopedias of terms and definitions. Only novel terms or common terms used in novel ways within the text of a code require definitions. An online search for "definition of dust suppression" returns the following as the first result: "Dust suppression is the process of controlling and reducing airborne dust particles in various environments."</p> <p>The proposed definition in this item closely reflects that response, indicating there is no novelty in either the definition or the use of the term within the code. Therefore, there is no need to include this term in Chapter 2 (Definitions) of the WESand.</p>
Tseng, Aster	NEGATIVE w/comment	A definition is not needed because the term is self-explanatory.
White, Charles	NEGATIVE w/comment	A definition is not needed because the term is self-explanatory.

Ballot Name:	WESand Item #008	
Voter Name	Vote	Comments
Sovocool, Kent	AFFIRMATIVE	Recognizing my understanding of the findings of PERC with respect to drainline carry for commercial building slope grades, I am, with reluctance, voting to affirm the group's decision. If there is evidence showing no inhibition of waste transport at the potentially more forgiving drainline slopes used in other types of developments, I could be persuaded to support the proposal by casting a negative vote. However, I also note that the conflict with other codes and standards is a significant concern and would need to be addressed comprehensively in future follow-up work.
Osann, Edward	NEGATIVE w/comment	The original substantiation provides ample justification for the adoption of this proposal. There will be no conflict with the plumbing code if this provision is included in the 2027 edition of the WESand and adopted by a state or local code-adopting body.

Ballot Name:	WESand Item #009	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	Water moving through an indoor fixture is not truly "consumed." In future editions, the WESand should consider adopting more accurate terminology, such as "volume of use" or "usage per flush."

Ballot Name:	WESand Item #013	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	The IAPMO IGC 330 standard is not health-protective.

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Ballot Name:	WESand Item #018	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	<p>While the current language of WESand may need revision, Item #018 is wide of the mark. Without justification, the proposal would allow continuous flow of up to 2.2 gpm through any dipper well. This is a tremendous waste, allowing over 1,000 gallons of water to be used during a single 8-hour shift.</p> <p>There is no standard that addresses the flow needed to move food particles to the drain nor the time in which this function must be performed; and there is no test procedure for measuring this function. Allowing a continuous flow of 2.2 gpm is unsupported by any studies or data made available to the TC.</p> <p>The committee consensus at the meeting in Ontario was for both Item #017 and Item #018 to be reconsidered by a working group rather than pushing through Item #018 without change.</p>
Cudahy, Michael	NEGATIVE w/comment	I support the substantiation provided by Kyle Thompson.
Harlan, Richard	NEGATIVE w/comment	I support the current FDA regulations and the substantiation provided by Kyle Thompson.
Mann, David	NEGATIVE w/comment	While I support some of the actions taken by the EPA, I do not believe the EPA should be used as the basis for our substantiation. The agency's position may change over time. WESand should have its own substantiation demonstrating that this flow rate is necessary to properly rinse utensils.
Ribbs, Phil	NEGATIVE w/comment	I support the current FDA regulations and the substantiation provided by Kyle Thompson.
Thompson, Kyle	NEGATIVE w/comment	<p>This proposed revision to Section 407.5 of the 2023 WESand seeks to restore a maximum flow rate of 2.2 gpm at 60 psi for dipper well faucets, aligning with the requirements previously set forth in the 2021 Uniform Plumbing Code. This change is necessary to ensure consistency with long-standing regulatory standards that support the operational and sanitary needs of commercial food establishments.</p> <p>Limiting dipper well faucets to 0.2 gpm creates a fundamental conflict with food safety mandates prescribed by both the U.S. Food and Drug Administration (FDA) and the California Retail Food Code. Specifically, Section 3-304.12 of the 2022 FDA Food Code and Section 114119 of the California Retail Food Code require that in-use utensils be stored "in running water of sufficient velocity to flush particulates to the drain."</p> <p>A flow rate of 0.2 gpm is insufficient to achieve this standard in many back-of-house kitchen environments where utensils may be soiled with heavy residues such as sauces, cheese, or grease. In these cases, a higher flow rate is essential to prevent buildup, maintain sanitary conditions, and minimize cross-contamination risks.</p> <p>Dipper wells are widely used in both front-of-house and back-of-house applications, but the operational demands vary significantly.</p>

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		<p>While a low flow rate may be adequate for light-duty uses (e.g., rinsing ice cream scoops), back-of-house kitchen environments require adjustable, higher flow rates to meet diverse and intensive cleaning needs. Continuous-flow dipper wells are commonly adjusted by operators to flush particulates quickly and are often integrated into broader food safety protocols. Setting an artificially low maximum flow rate, such as 0.2 gpm, removes the flexibility necessary for safe operation.</p> <p>In summary, reinstating the 2.2 gpm maximum flow rate recognizes the role of dipper wells in public health protection. It ensures that the performance of these fixtures aligns with food safety codes, real-world kitchen demands, and long-standing plumbing standards, preserving both operational flexibility and consumer safety.</p>
Tseng, Aster	NEGATIVE w/comment	I support the substantiation provided by Kyle Thompson.

Ballot Name:	WESand Item #027	
Voter Name	Vote	Comments
Cudahy, Michael	NEGATIVE w/comment	The term “leak” should remain.
Kendzel, Jim	NEGATIVE w/comment	It is not clear what is being “detected, monitored, or controlled” in the water supply. This language needs clarification before it can be included in the standard.
Mann, David	NEGATIVE w/comment	I am in agreement with the comments by Phil Ribbs and Jim Kendzel. Removing the term "leak" makes the remaining language very unclear.
Ribbs, Phil	NEGATIVE w/comment	I agree with Jim Kendzel. It is not clear what is being “detected, monitored, or controlled” in the water supply.
Sovocool, Kent	NEGATIVE w/comment	I agree that some reference to water loss or at least a specific condition is needed, as the language is now too vague.
Tseng, Aster	NEGATIVE w/comment	I agree with Jim Kendzel's comment.
White, Charles	NEGATIVE w/comment	It is unclear what is being detected. The term "leak" should remain.

Ballot Name:	WESand Item #028	
Voter Name	Vote	Comments
Moscovich, Avishai	NEGATIVE w/comment	<p>I respectfully object to the rejection of this proposal. The original language in Section 411.1.2 (Unusual Flow) includes prescriptive heuristics that may inadvertently limit the adoption of modern and more effective leak detection technologies.</p> <p>The proposed revision aimed to replace these rigid thresholds with more performance-based and adaptable criteria. This change would allow systems to:</p> <ul style="list-style-type: none"> <li>Continuously adapt detection parameters based on actual building usage patterns and seasonal variability.</li> <li>Utilize AI or machine learning algorithms for flow pattern recognition rather than fixed triggers.</li> </ul>

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		<ul style="list-style-type: none"> <li>Identify a broader spectrum of water anomalies that traditional heuristics may miss, such as sustained low-flow leaks that do not trigger high-volume alarms.</li> </ul> <p>Given the rapid innovation in smart metering and anomaly detection, codifying rigid thresholds at this stage risks obsolescence and may deter the market from introducing advanced solutions that exceed the current baseline. A more generalized performance-based approach would preserve the intent of accurate detection while fostering innovation.</p>
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Ballot Name:	WESstand Item #029	
Voter Name	Vote	Comments
Moscovich, Avishai	NEGATIVE w/comment	<p>I object to the committee's decision to reject this proposal. The proposed expansion to Section 409.0 (Leak Detection and Control) was intended to modernize and broaden the scope of leak detection beyond basic domestic use. Water loss can occur in multiple subsystems of a building, including HVAC loops, cooling towers, irrigation systems, and process water lines. Failing to explicitly reference these applications in the standard creates a gap in guidance at a time when whole-building water intelligence is becoming the norm. The proposed revision also introduced important best-practice features such as:</p> <ul style="list-style-type: none"> <li>Edge computing for real-time analysis and alerts, reducing latency in detecting critical water events.</li> <li>Multi-format alerting to ensure rapid response by operations teams.</li> <li>The ability to isolate subsystems when a leak is detected to limit damage and water waste.</li> </ul> <p>These are not vendor-specific recommendations. They reflect industry trends and field-proven features that reduce water consumption and mitigate risk. The rejection of these updates misses an opportunity to elevate WESstand as a leading standard for smart water management practices.</p>

Ballot Name:	WESstand Item #033	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	Much good work has been done here. If multi-family revisions are completed before the end of the comment period, the submitter should submit a comment that will enable the TC to take positive action.

Ballot Name:	WESstand Item #035	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	This proposal is compelling, but it needs some refinement. The proponent should come back with a public comment providing the clarifications sought by the TC.

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<b>Ballot Name:</b>	<b>WESand Item #038</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
White, Charles	NEGATIVE w/comment	<p>The proposal effectively restates the title of the chapter as the purpose of the chapter. It then goes on to create the term “circular sanitation.” There is no substantiation that “circular sanitation” is an accepted term in the industry.</p> <p>The purpose statement goes on to attempt to repeat the proposed definition of circular sanitation. It would be better to stop at the statement that the purpose is to facilitate circular sanitation, that is, use the definition. I say this because the continuation of the statement does not match the proposed definition. It is not necessary to repeat the language.</p> <p>While the concept of these systems does indeed facilitate circular sanitation, the systems do not actually perform circular sanitation. Another means of handling the recovered materials must occur to complete the process. These other means are not addressed in the WESand, resulting in systems that have no mandate to complete the circle.</p>

<b>Ballot Name:</b>	<b>WESand Item #076</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Sovocool, Kent	ABSTAIN w/comment	<p>I am not sure I follow the logic behind the removal of this seemingly safety-oriented requirement. Since I cannot determine whether it compromises safety or if I am misunderstanding the proposal, I am voting to abstain.</p>

<b>Ballot Name:</b>	<b>WESand Item #085</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Osann, Edward	NEGATIVE w/comment	<p>This proposal changes the nomenclature for “alternate design systems” in three different chapters, substituting the term "engineered systems" in its place. However, no definition is provided for "engineered systems," and it is important to note that systems listed to a product standard have undoubtedly been engineered in their development and production.</p> <p>Listed systems and alternative design systems are subject to different requirements, so maintaining a clear distinction between the two is essential. A more intuitive term, such as "unlisted system" or "site-built system" could be used.</p> <p>At a minimum, if the term "engineered system" is going to be used, it must be accompanied by a definition. The proposal would still be useful without revising the term "alternative design system," which has been in the WESand since the 2020 edition.</p>
Sovocool, Kent	NEGATIVE w/comment	<p>I concur with Ed Osann's perspective. The basic idea is sound, but some language corrections are needed.</p>

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Ballot Name:	WESand Item #093	
Voter Name	Vote	Comments
Osann, Edward	NEGATIVE w/comment	This proposal contains important updates that should be incorporated into the 2027 WESand. I disagree with the assertion in the committee's reason statement that the language implies treatment is limited to the two enumerated methods. Neither method is required, and treatment itself is not mandated. While I believe the proposal as submitted is acceptable, the sentence regarding the positioning of treatment systems downstream from a storage tank could be revised through a public comment to further clarify that treatment of harvested rainwater is not required in all cases.

Ballot Name:	WESand Item #096	
Voter Name	Vote	Comments
Osann, Edward	AFFIRMATIVE	I disagree with the committee statement. The suitability of this proposal within the scope of WESand should be evaluated by a working group, along with the other proposals regarding plumbing and mechanical systems that were submitted on behalf of ASHRAE.
Sovocool, Kent	AFFIRMATIVE	I need a better understanding of how this proposal specifically relates to water conservation. If that can be clearly explained, I may be willing to reconsider and change my vote.

Ballot Name:	WESand Item #104	
Voter Name	Vote	Comments
Allen, Laura	NEGATIVE w/comment	<p>What is being rejected by the committee is currently allowed and promoted by many cities and water agencies, including SF Water, Valley Water (San Jose), Pasadena Water and Power, and others. I have observed hundreds of these systems functioning effectively over many years. I know professional installers who regularly install them for clients, many of whom receive rebates. These systems are not new; they have been field tested and proven over time. The concerns raised by the committee regarding this type of system were not based on evidence or firsthand experience.</p> <p>In contrast, the configuration currently depicted in WESand and which will remain by default is not one I am confident will perform well. I would not support including it in the standard in its current form. In the field, when installers tie into the vent, as shown in the illustration, they typically include a check valve to prevent graywater from being pushed up into the vent pipe. No such valve is shown in the drawing.</p>
Cudahy, Michael	AFFIRMATIVE	I agree with the potential concern raised that this application is only completely workable with complete dual standpipes. Either swap the discharge hose to the other standpipe or install a valve that performs this function. Some washing machines likely have timed discharge cycles, and backflow may occur if the machine experiences excessive back pressure due to a long hose run and is not emptied in time. This could also place additional strain on appliance parts and motors. Dual standpipes seem to work.

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<b>Ballot Name:</b>	<b>WESand Item #105</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Allen, Laura	AFFIRMATIVE	I agree that we need a task group to reach agreement on the images and improve them. However, I do not agree with leaving the image as is, as noted in my previous comments on Item #104.
Osann, Edward	AFFIRMATIVE	I support the committee's statement that all figures should be reviewed by a task group for potential modification.