GEW155-14
702.5

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Delete without substitution:

~~**702.5 Nonwater urinal connection.** The fixture drain for nonwater urinals shall connect to a branch drain that serves one or more lavatories, water closets or water-using urinals that discharge upstream of such urinals.~~

Reason: This provision is in conflict with every current model plumbing code in the country, including the most widely adopted IPC. The experts on the 2015 International Plumbing Code Committee, those charged with the minimum health and safety provisions of the plumbing system, along with industry and ICC members addressed this provision during the recent code cycle and disapproved it based on lack of data to prove it is an issue. (See committee reasoning below P62-12. *underline emphasis added*)

`When nonwater urinals are maintained properly per manufacturer installation instructions and the fixture listing requirements, water is periodically flushed through the fixture and into the fixture drain. This serves the purpose of dissolving and removing any potential urine salts in the drainage system.

This provision has potential to have a counter effect on water efficiency efforts. In many cases, It adds additional expense to the initial design and installation of nonwater supplied urinals, deterring efforts to utilize water saving fixtures. Moreover, building owners desiring to be environmentally friendly by conserving thousands, and possibly millions, of gallons of water, by directly replacing existing high volume urinals with new nonwater urinals will oftentimes find it cost prohibitive to re-design and reconfigure a public or commercial bathroom drainage, vent and water supply system located behind the walls of the structure to accommodate this provision.

This provision singles-out nonwater urinals yet does not address issues associated with low flow urinals (1 pint typ.) with minimally diluted urine/water mixtures that tend to trickle through the drainage piping, allowing lime and calcium deposits to accumulate and harden, potentially causing damage to the plumbing drainage system.

Ironically, if this provision remains, the IPC has the potential to save millions more gallons of potable water than the IgCC. Logically, the IgCC should mesh with the IPC by removing this provision and revisiting it when the IPC reconsiders and more date is provided to support claims of drainage issues, which have such a negative effect on water conservation.

As mentioned above, the current section is in conflict with the IPC. The following is the most recent committee action and comment pertaining to the 2015 IPC Proposal.

IPC Technical Committee (2015) reasoning:

P62-12 Committee Action: <u>Disapproved</u>

Committee Reason: The opposition testimony was compelling in stating that there is <u>not any</u> <u>data to support that nonwater urinals are causing widespread problems</u>. To write code language to be mandatory to fix a product that is not performing, is not an acceptable way to solve the problem. If the product does not perform properly then other action should be taken.

Cost Impact: Will not increase the cost of construction. The original provision increases cost of construction whereas removing this provision could potentially reduce costs and make saving a substantial amount of potable water more realistic and less expensive.

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