



# California Metals Coalition

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October 9, 2009

California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833  
Attn: Dave Walls, Executive Director

Dear Mr. Walls,

## **RE: OPPOSE Toxic Pipe Use in Hospitals, Nursing Facilities, and Correctional Centers**

The **California Metals Coalition (CMC)** was established in 1972 and today represents over 200 metalworking corporations—employing over 25,000 Californians with living-wage jobs and benefits.

California has always led the nation in safety and environmental standards. For buildings (such as, hospitals, skilled nursing facilities, licensed clinics, and correctional treatment centers) which fall under the jurisdiction of the Office of Statewide Health Planning and Development the use of PVC and ABS installations is strictly prohibited. This is due to the toxic dangers of PVC and ABS pipe.

CMC is strongly urging you not to adopt changes from the 2009 Uniform Plumbing Code into the 2010 California Plumbing Code, which would allow the use of PVC and ABS. Repealing sections 701.1.2.1, 705.2.5, 903.1.2.1, and 1101.3.1 is ignoring health and safety requirements for Californians.

In hospitals, nursing facilities and correctional facilities, PVC and ABS is easily destroyed in a fire. In fact, water temperatures over 140 degrees can fracture these pipes. For multi-story buildings, safety risks only increase in fires. Waste from these pipes is exposed to the public when the pipe is destroyed. Water from these pipes can further damage buildings. Cast iron is not compromised in fires.

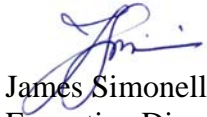
PVC and ABS produce toxic fumes when burned. Firefighters and safety officials attempting to save patients will be harmed by dioxins. Burning PVC produces at least 75 byproducts of combustion, including carcinogens such as vinyl chloride, PCBs, chlorobenzene and other aromatic hydrocarbons such as benzene, toluene, xylene, and naphthalene. (Source: Greenpeace <http://archive.greenpeace.org/toxics>).

PVC is buried in landfills. Cast iron is 100% recycled. More than seven billion pounds of PVC has been thrown away in the U.S., and only 18 million pounds —**barely one quarter of 1 percent**— is recycled (Source: <http://Earth911.com>). PVC also interferes with the recycling of other plastics if commingled due to its chemical make-up.

The California Building Standards Commission should not change California code and allow PVC and ABS into these critical buildings. It is your duty to protect our hospitals, nursing facilities, and correctional centers.

Cast iron pipe is quiet, fireproof, safe and environmentally friendly. The California Metals Coalition strongly opposes eliminating the health and safety codes that protect Californians. Thank you.

Most Sincerely,



James Simonelli  
Executive Director

Cc: Senate President Darrell Steinberg  
Assembly Speaker Karen Bass  
Senator Loni Hancock  
Assemblymember Sandre Swanson  
Senator Ellen Corbett  
Senator Gloria Romero