



CALIFORNIA METALS COALITION

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Sent Via Email Glenn.Gall@oshpd.ca.gov

Subject: Metals Industry Opposition to Allow Plastic Piping in OSHPD 1,2,3, and 4 Facilities

On behalf of the state's metalworking industry, we are in strict opposition to removing the existing California Plumbing Code (CDC) exemptions that prohibit the use of ABS, PVC and CPVC pipe in OSHPD 1, 2, 3, and 4 facilities as well as any modifications to the code to allow the use of plastic piping in OSHPD facilities.

The state plumbing code was established to protect public health and safety. By weakening the California Plumbing Code, it exposes Californians to serious risk.

California is home to approximately 4,000 metalworking facilities, employing over 110,000 Californians with high-paying manufacturing jobs and health benefits. 8 out of 10 employees in the metalworking sector are considered ethnic minorities or reside in disadvantaged communities. California's metalworking companies recycle discarded metal and manufacture new components used in: aerospace, biotech apparatuses, solar panels, electric cars, medical devices, infrastructure, national defense, agriculture, construction, transportation and millions of other applications.

The California Metals Coalition (CMC) was established in 1972 and is a full-service trade association with lobbyists, government relations team, legal counsel and technical experts.

IGNORING NEW LIABILITY TO HOSPITALS, HEALTH CARE FACILITIES, AND CONTRACTORS:

It is unclear why your agency is ignoring the balanced, arduous process that established the state plumbing code for plastic pipe installation. The state plumbing code is there to protect consumers, contractors, end-users, and even municipalities with the inherent risks. The experts

who established the California plumbing code do not allow plastic piping to be used in OSHPD 1, 2, 3, and 4 facilities. By circumventing these conclusions and adopting new amendments, the Office of Statewide Health Planning and Development will create new liabilities to cities, contractors/mechanical contractors, public, health care professionals, and building owners.

PLASTIC PIPE AND FIRE:

Relying on advancements in a building's fire suppression system does not address the issues inherent with plastic piping in the interior of a wall, under floors, or throughout the structure. The science is clear why non-combustible metallic piping has been used safely and reliably for over a hundred years in California. By using combustible plastic (PVC/ABS) in OSHPD 1, 2, 3, and 4 facilities is to acknowledge and accept the health and safety risk to firefighters, hospital workers, health care professionals, and patients/occupants.

DESTROYING SKILLED UNION LABOR & MIDDLE CLASS JOBS:

Installing metal pipe requires highly skilled labor, and is often performed by union members throughout the state. California's middle class jobs will be at greater risk when lower skilled, cheaper labor is used to install plastic pipe. Plumbing and mechanical engineers, facility managers, building owners and inspectors rely on this skilled labor to install metal pipe, fittings, couplings, gaskets and drainage products for sanitary and storm water drain, waste and vent plumbing systems.

LIFE CYCLE OF METAL vs. PLASTIC:

California has set the highest standards for recycling, and understands the importance of the life cycle of a material or product. Metal is the only material that is 100% recyclable. Moreover, discarded metal pipe can be recycled and reused again as metal pipe. The life cycle, including end of life use of plastic pipe, does not measure up to the environmental advantages of metal.

PURPORTED COST SAVINGS WILL ONLY BENEFIT DEVELOPERS:

A true cost analysis of metal vs. plastic goes beyond the "off-the-shelf" charge. A true cost analysis should include, but is not limited to:

- Hanging the pipe throughout the building.
- Combustible load risk in a building.
- Training, inspection, and time (plus staff) needed to ensure plastic piping systems and fire suppression system are properly installed, functioning and in compliance.
- If relying on a building's fire suppression system, what percentage of failure occurs (including times when suppression operates but is ineffective) and what are the related costs/risks.

- If relying on a building's fire suppression system, what is the average loss of life and property when any/all parts of a system fails.
- If the fire reaches and melts the plastic pipe, what is the potential damage and risk vs. metal pipe.
- If the fire reaches and melts the plastic pipe, what is health hazard cost associated with exposure to waste/gases from the pipe.
- Insurance costs and risks.
- Installation costs.
- Durability and longevity for the extended life of the building.

STOP PURSUIT OF PROPOSAL:

In closing, the EIR provided does not clearly represent the health and safety risks to the healthcare workers and patients. Please carefully consider this effort by the building development community to increase their bottom line while sacrificing health and safety.

Thank you for your dedication to our state, supporting middle-class jobs, and balancing the needs of businesses and communities. Please do not hesitate to contact CMC with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jim', with a stylized flourish extending to the right.

James Simonelli
Executive Director