

From: 2023wetc@kavi.iapmo.org on behalf of [Taylor Duran](#)
To: 2023wetc@kavi.iapmo.org
Subject: [EXTERNAL][2023wetc] 2022 WEStand ROP Second Circulation of Negative Comments
Date: Wednesday, August 17, 2022 3:53:54 PM
Attachments: [2022 WE•Stand ROP Second Circulation of Comments.pdf](#)

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Dear WE•Stand Technical Committee Members,

In accordance with Section 5.6 of the Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard, I have attached the additional negative comments received after the recirculation period to allow the committee the opportunity to review the comments.

The ballot material for the subject documentation is now available on the KAVI site at:
<https://kavi.iapmo.org/apps/org/workgroup/2023wetc/ballots.php>

The additional negatives received are for Item #014, Item #018, Item #020, Item #022 Item #027, Item #032, Item #038, Item #045, Item #046, Item #047, Item #053, Item #055, Item #064, Item #079, Item #081, Item #086, Item #093, Item #106, Item #107, Item #110, Item #113, Item #121, Item #123, Item #124, Item #125, Item #126, Item #127, Item #128, Item #129, Item #132, and Item #133. Therefore, these items will be reopened to allow the committee the opportunity to review the comments.

If you do not wish to change your vote, no action is required. However, if you wish to change your vote after review of comments, you may do so by **Monday, August 22, 2022, at 5:00 PM (PT)**. Any affirmative voters can change their vote.

If you wish to change your vote [negative] or indicate [abstain], please provide your comments by replying to this email or submitting on Kavi.

Thank you for your willingness to serve on this committee.

TAYLOR DURAN
Code Development Administrator
USHGC & WE-Stand Staff Liaison
Office: (909) 218-8126
Email: taylor.duran@iapmo.org
IAPMO World Headquarters
4755 E. Philadelphia Street
Ontario, CA 91761

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 014	
Voter Name	Vote	Comments
Lansing, John	NEGATIVE w/comment	The term "sewage" is appropriate in this application.

Ballot Name:	Item # 018	
Voter Name	Vote	Comments
Lansing, John	NEGATIVE w/comment	Further terminology clarification is warranted, even though the use within the text is currently limited.

Ballot Name:	Item # 020	
Voter Name	Vote	Comments
Barnes, Samantha	AFFIRMATIVE	I agree with the comment left by the American Supply Association (Jim Kendzel).
Premer, Damon	NEGATIVE w/comment	"Effluent" needs to be defined in the WE•Stand.
Tabakh, Amir	NEGATIVE w/comment	I agree with the other comments provided.
Lansing, John	NEGATIVE w/comment	Adding a definition for "effluent" is useful for further strengthening the WE•Stand document.

Ballot Name:	Item # 022	
Voter Name	Vote	Comments
Klein, Gary	NEGATIVE w/comment	WE•Stand needs to lead the way with better language even if it runs counter to currently accepted terms.

Ballot Name:	Item # 027	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I agree with the prior comments in terms of editorial change.

Ballot Name:	Item # 032	
Voter Name	Vote	Comments
Tabakh, Amir	NEGATIVE w/comment	"Shall" is already defined in a common dictionary to express a mandatory requirement.
Klein, Gary	NEGATIVE w/comment	I don't think there is a need to define either of these words. If we feel it is necessary to explain when "shall" or "should" is used in the standard, we can provide such explanations in the preface.
White, Charles	NEGATIVE w/comment	"Shall" is fine for code language. "Should" does not belong in code language.
Cudahy, Michael	NEGATIVE w/comment	No need to define these words.

Ballot Name:	Item # 038	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	"Water feature" needs a definition.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 045	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I am in agreement with Mr. John Koeller.
Tabakh, Amir	NEGATIVE w/comment	I concur with John Koeller's comments.
Lansing, John	NEGATIVE w/comment	I concur with John Koeller.
Cudahy, Michael	NEGATIVE w/comment	I concur with John Koeller.

Ballot Name:	Item # 046	
Voter Name	Vote	Comments
Cudahy, Michael	AFFIRMATIVE	Zero leakage is not achievable.
Premer, Damon	NEGATIVE w/comment	Allowing leakage is not in congruence with WE•Stand goals.
Klein, Gary	NEGATIVE w/comment	WE•Stand needs to lead the way. Zero leakage is obtainable, and we should not weaken the standard.
Layton, Rick	NEGATIVE w/comment	We should not settle for minimal leakage just because we have a standard to test for the leakage.
Koeller, John	NEGATIVE w/comment	<p>What the proponent of this proposal is attempting to do is change a provision that was debated extensively and voted upon in the previous round of WE•Stand several years ago.</p> <p>The "substantiation" offered here by the proponent is exactly what justifies its rejection. OF COURSE, the current provisions in WE•Stand do not "prevent" leakage in the future. JUST AS a showerhead flow rate limitation requirement doesn't prevent a higher flow in that showerhead in the future, or a faucet or toilet, for that matter. What WE•Stand has provided for (and the proponent of this modification is attempting to overturn) is a specified performance WHEN NEW! That is all such a specification can provide!</p> <p>Furthermore, there is NO NEED to test a diverter in the "field" as the proponent inaccurately describes. The California Energy Commission already qualifies products through an independent testing process by accredited laboratories that results in a LISTING (just as is done for numerous other plumbing products). As such, the "substantiation" is irrelevant and does not fit the 'real world' situation with today's diverters, their testing, their listing, and their application as a water use efficiency provision.</p> <p>To provide further clarification on Mr. Markus Lenger's comment, zero leakage not only "should be" achievable but, in fact, IS achievable and has been so for many years. In fact, in 2015, there were 360 different diverter models in the CEC listings that were "zero leakage." Undoubtedly, there are many more today.</p>
White, Charles	NEGATIVE w/comment	This has been highly debated and continues to show up. As a stretch code, it should be acceptable to go beyond the minimum requirements.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 047	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I am in agreement with Cambria McLeod's comment.
Smith, Billy	NEGATIVE w/comment	I agree with Cambria McLeod as written here: "The language is not enforceable and is unclear. Additionally, markings on escutcheons or other trim components are not possible in all applications as these parts are used on a multitude of different products."
Mann, David	NEGATIVE w/comment	After further review, I am trying to figure out what the purpose is of this requirement. The valve and shower head generally come as a kit. If one is trying to protect the end user (homeowner), forget that. They will not understand what this marking means. This is overly restrictive to our manufacturing industries' costs for something that the installer already knows, and the end user has no clue.
Layton, Rick	NEGATIVE w/comment	Products are required to be manufactured to ASSE 1016/ASME A112.1016/CSA B125.16 requirements. Adding this language to WE•Stand is not enforceable.
McLeod, Cambria	NEGATIVE w/comment	The language is not enforceable and is unclear. Additionally, markings on escutcheons or other trim components are not possible in all applications as these parts are used on a multitude of different products.
Sewell, Robert	NEGATIVE w/comment	The language is not enforceable and is unclear. Additionally, markings on escutcheons or other trim components are not possible in all applications.
Cudahy, Michael	NEGATIVE w/comment	The language is not enforceable and is unclear.
Granger, Brian	NEGATIVE w/comment	The language is unclear and not enforceable.

Ballot Name:	Item # 053	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I agree with Kent Sovocool as well. Venturis by definition work in this manner.
Allen, Laura	NEGATIVE w/comment	I agree with Kent Sovocool's comment.

Ballot Name:	Item # 055	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I am in agreement with Mr. Thomas Pape.
Klein, Gary	NEGATIVE w/comment	I agree with Thomas Pape
Koeller, John	NEGATIVE w/comment	I am concerned over the observation made by Mr. Kent Sovocool and am changing my vote.
Lansing, John	NEGATIVE w/comment	I agree with Mr. Thomas Pape's comments.
Barnes, Samantha	NEGATIVE w/comment	I agree with the comments made by the Southern Nevada Water Authority (Kent Sovocool) and the American Supply Association (Jim Kendzel).

Ballot Name:	Item # 064	
Voter Name	Vote	Comments
Lansing, John	NEGATIVE w/comment	I also concur with Markus Lenger. The proposal is overly restrictive.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 079	
Voter Name	Vote	Comments
Pape, Thomas	NEGATIVE w/comment	I agree with Mr. John Koeller's statements.
Cudahy, Michael	NEGATIVE w/comment	Exempting this from jurisdictional oversight for single-family applications is reasonable. I am not sure it will see wide use.
Thompson, Kyle	NEGATIVE w/comment	I agree with the comments already submitted. This proposal may help encourage technological improvements in a practice that many rural households already apply on a regular basis. Repurposing urine for fertilization of existing landscape in single-family residential properties versus using potable water to flush seems like the most efficient solution when possible.

Ballot Name:	Item # 081	
Voter Name	Vote	Comments
Smith, Billy	NEGATIVE w/comment	I agree with Gary Klein.
Klein, Gary	NEGATIVE w/comment	The transfer to new owner requirement is not enforceable and needs to be removed.
White, Charles	NEGATIVE w/comment	I agree with Jim Kendzel.

Ballot Name:	Item # 086	
Voter Name	Vote	Comments
Klein, Gary	AFFIRMATIVE	Wording needs to be improved during public comment.
Lansing, John	NEGATIVE w/comment	I agree with the proponent's statement. Backflow seals are an important component for urine diversion systems.

Ballot Name:	Item # 093	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I think this is well intended, but there are currently no state or local agencies that can enforce this.

Ballot Name:	Item # 106	
Voter Name	Vote	Comments
Barnes, Samantha	AFFIRMATIVE	I agree with the comments that use of the term "potable" unnecessarily limits the water source and that use of any water meeting safe drinking water standards should be considered.
McLeod, Cambria	AFFIRMATIVE	The intent of this proposal is to ensure human health and safety. As this water will have direct contact with the body, it is important to ensure its safety. Let's get this safety requirement into WE•Stand, and if we the committee need to clarify what type of water constitutes safe, let's do that in the next round. For now, let's ensure we are protecting human health and safety as the priority.
Klein, Gary	NEGATIVE w/comment	The requirement should be that the water meets Safe Drinking Water Requirements.
Allen, Laura	NEGATIVE w/comment	I agree with the other comments and think the water quality should be specified to meet safety requirements.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 107	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	Based on the comments, more discussion is needed.
Tabakh, Amir	NEGATIVE w/comment	This should be referred back to Task Group to address the concerns.
Klein, Gary	NEGATIVE w/comment	I agree with Thomas Pape and Markus Lenger.
Lansing, John	NEGATIVE w/comment	Further revisions are needed prior to incorporating this into WE•Stand.
White, Charles	NEGATIVE w/comment	I agree with concerns for log reductions as basis of water quality.

Ballot Name:	Item # 110	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	I agree with Jim Kendzel as well, but adding, as this technology matures and more manufacturers make "tanks," it is even more important to protect our systems. Thus, mandating adherence to basic standards.
Smith, Billy	NEGATIVE w/comment	I agree that the use of product standards is appropriate.
Klein, Gary	NEGATIVE w/comment	I agree with Jim Kendzel.
Koeller, John	NEGATIVE w/comment	I concur with the comments of Mr. Jim Kendzel and therefore change my vote.
White, Charles	NEGATIVE w/comment	I agree that the use of product standards is appropriate.
Cudahy, Michael	NEGATIVE w/comment	I agree with Jim Kendzel.
Barnes, Samantha	NEGATIVE w/comment	I agree that the use of product standards is appropriate.

Ballot Name:	Item # 113	
Voter Name	Vote	Comments
White, Charles	NEGATIVE w/comment	<p>The rationale says that there is no benefit to users for exceeding this area; that is in the proponent's opinion. Users may indeed derive some benefit that they value.</p> <p>The 60% for single story and 30% for 2 stories or more is confusing. Are we really talking about the footprint?</p> <p>A 1000 ft² single story would be allowed 600 ft², but a two story at 1000 ft² per floor gets 600 ft². Is that on two floors?</p> <p>Does a three story at 1000 ft² per floor get 900 ft²? Is that the footprint, or all floors in the rectangle? I believe this needs more work.</p>

Ballot Name:	Item # 121	
Voter Name	Vote	Comments
Premer, Damon	NEGATIVE w/comment	This language is confusing.
Klein, Gary	NEGATIVE w/comment	The proposed language is more confusing than the existing language.
Cudahy, Michael	NEGATIVE w/comment	This doesn't add clarity.
Thompson, Kyle	NEGATIVE w/comment	I agree with the comments submitted by others. The existing text is clearer than the proposed revision.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 123	
Voter Name	Vote	Comments
Klein, Gary	NEGATIVE w/comment	This needs to be cleaned up during public comment.

Ballot Name:	Item # 124	
Voter Name	Vote	Comments
Lenger, Markus	AFFIRMATIVE	<p>As the proponent and author, I agree with the poor choice of “family.” It was referring to the low microbiological risk within a household. I will address the issue in public comments.</p> <p>As to the need for more input, I disagree. Science does not work on consensus. The proposed appendix lays out all commonly known treatment technologies and all industry-standard stages. This is already being done, and the AHJ can approve a system, regardless of this appendix, if it chooses to do so. It also could be an engineered system.</p>
White, Charles	NEGATIVE w/comment	I do not support these proposals related to direct potable water reuse and believe more clarification is needed.
Cudahy, Michael	NEGATIVE w/comment	I concur with Jim Kendzel.

Ballot Name:	Item # 125	
Voter Name	Vote	Comments
Smith, Billy	NEGATIVE w/comment	I agree as written here from Chuck White: “I do not support these proposals related to direct potable water reuse and believe more clarification is needed.”
White, Charles	NEGATIVE w/comment	I do not support these proposals related to direct potable water reuse and believe more clarification is needed.

Ballot Name:	Item # 126	
Voter Name	Vote	Comments
Smith, Billy	NEGATIVE w/comment	I agree with Chuck White as shown here: “I do not support these proposals related to direct potable water reuse and believe more clarification is needed.”
White, Charles	NEGATIVE w/comment	I do not support these proposals related to direct potable water reuse and believe more clarification is needed.
Barnes, Samantha	NEGATIVE w/comment	I agree with the comment by the American Supply Association (Jim Kendzel).

Ballot Name:	Item # 127	
Voter Name	Vote	Comments
Lenger, Markus	AFFIRMATIVE	<p>As the proponent, I agree that references to the existing standards need to be revised/clarified as they are used to reference desired water quality parameters, not the technology used.</p> <p>As to the statements that the technologies listed are not able to achieve the stated water quality, they are false. The listed treatment trains achieve the desired quality, as they are used in all existing treatment systems.</p>

2022 WE•Stand ROP Second Circulation of Comments

		The descriptions are not specific enough to state that the performance is NOT achievable. The purpose of this appendix is to leave that up to the designers.
Koeller, John	AFFIRMATIVE	I agree with the comments by Mr. Markus Lenger.
Premer, Damon	NEGATIVE w/comment	I agree with the comments listed, nothing more to add.
Smith, Billy	NEGATIVE w/comment	I agree with Chuck White as written here: “I do not support these proposals related to direct potable water reuse and believe more clarification is needed. Additionally, this proposal says these will be installed by registered design professionals. Design professionals will likely not do the installation.”
Tabakh, Amir	NEGATIVE w/comment	I agree with the comments listed.
White, Charles	NEGATIVE w/comment	I do not support these proposals related to direct potable water reuse and believe more clarification is needed. Additionally, this proposal says these will be installed by registered design professionals. Design professionals will likely not do the installation.

Ballot Name:	Item # 128	
Voter Name	Vote	Comments
Smith, Billy	NEGATIVE w/comment	I agree with Chuck White as written here: “I do not support these proposals related to direct potable water reuse and believe more clarification is needed.”
White, Charles	NEGATIVE w/comment	I do not support these proposals related to direct potable water reuse and believe more clarification is needed.
Barnes, Samantha	NEGATIVE w/comment	I agree with the comment by the American Supply Association (Jim Kendzel).

Ballot Name:	Item # 129	
Voter Name	Vote	Comments
Koeller, John	NEGATIVE w/comment	I concur with Mr. Gary Klein's comments.
White, Charles	NEGATIVE w/comment	This proposal is written to force the specified occupancies to be affected rather than spelling out what to do if one chooses to elect a gray water system. I would say it goes beyond lowering the barriers to using gray water systems and forces everyone most of the way there.

Ballot Name:	Item # 132	
Voter Name	Vote	Comments
White, Charles	NEGATIVE w/comment	The illustrations show some issues with this concept. The use of diverter valves seems to show an issue for cleaning out the line through the diverter valve, and it does not appear they are sanitary pattern valves. Also, the use of splitter fittings (double elbows) would present cleanout issues.

2022 WE•Stand ROP Second Circulation of Comments

Ballot Name:	Item # 133	
Voter Name	Vote	Comments
McLeod, Cambria	AFFIRMATIVE	I do not see enough technical justification to support the limitation.
Premer, Damon	NEGATIVE w/comment	Further substantiation is needed for proposal.
Tabakh, Amir	NEGATIVE w/comment	I agree with the arguments against.
Lansing, John	NEGATIVE w/comment	I agree with prior comments. Further substantiation is needed for the proposal.