

**Environmental Health Services Division**

401 Fifth Avenue, Suite 1100  
Seattle, WA 98104-1818

**206-205-4394** Fax 206-296-0189  
TTY Relay: 711

www.kingcounty.gov/health

**MEMORANDUM**

**TO:** The Washington State Building Code Council,  
c/o C. Ray Allshouse, Council Chair

**FROM:** Dave Cantrell, Chief Plumbing Inspector  
Representing Public Health – Seattle & King County

**DATE:** September 18, 2012

**SUBJECT: PUBLIC COMMENT ON PROPOSED RULE MAKING ADOPTING AND  
AMENDING THE 2012 UNIFORM PLUMING CODE (UPC)**

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The provisions for nonpotable water reuse systems and nonpotable rainwater catchment systems were greatly improved in the 2012 UPC. I am in agreement with deleting our current statewide amendment to Chapter 16 of the 2009 UPC and adopting these provisions in Chapters 16 and 17 of the 2012 UPC as outlined in the proposed rule making with these four recommendations for modifications.

**Item #1 – Chapter 17 of the 2012 UPC is proposed for adoption, and it contains the provisions for nonpotable use of rainwater catchment systems. The exemptions in Section 1601.3 apply only to rainwater catchments systems and should be included in Chapter 17 (see Item #3). Therefore, the proposed statewide amendment to Section 1601.3 should be modified to delete the exception language as follows:**

**1601.3 Permit.** It shall be unlawful for a person to construct, install, alter, or cause to be constructed, installed, or altered an alternate water source system in a building or on a premise without first obtaining a permit to do such work from the authority having jurisdiction.

**EXCEPTIONS:** ~~1. A permit is not required for exterior rainwater catchment system used for outdoor drip and subsurface irrigation with a maximum storage capacity of 360 gallons (1363 L).  
2. A plumbing permit is not required for rainwater catchment systems for single family dwellings where outlets, piping, and system components are located on the exterior of the building. This does not exempt the need for permits where required for electrical connections, tank supports, or enclosures.~~

**Item #2 – The current Chapter 16 state amendment includes provisions for abandoning water reuse systems. However, this language does not exist in Chapter 16 of the 2012 UPC. Therefore, a new section 1601.10 should be added by amendment to include this important administrative provision as follows:**

**1601.10 Abandonment.** Where alternate water source systems for nonpotable use are abandoned, the procedure for abandonment shall be as required by the Authority Having Jurisdiction. Components of the abandoned system, including, but not limited to, pipe, tubing, fittings and valves shall not be used for potable water systems.

**Item #3** – *The permit exception provisions for nonpotable rainwater catchment systems was not included in Chapter 17. The proposed state amendments to Sections 1601.1.1 and 1601.2 removed reference to rainwater systems for this reason, but the permit exceptions are still captured in Section 1601.3. Item #1 above is the proposal to remove those exceptions in that section, and this proposal is to reinsert those exceptions by including permit provisions in Chapter 17. Section 1702.2 of the 2012 UPC speaks to plumbing plan submission. It would be best to include the permit provisions in Section 1702.2 and then add the plumbing plan submission provisions as a subsection 1702.2.1. Note also that the last sentence for plumbing plan submission is being deleted because it is already contained in Section 1702.3. Therefore, Section 1702.2 of the 2012 UPC should be amended by the state and a new Section 1702.2.1 should be added as follows:*

**1702.2 Permit.** It shall be unlawful for a person to construct, install, alter, or cause to be constructed, installed, or altered a nonpotable rainwater catchment system in a building or on a premise without first obtaining a permit to do such work from the authority having jurisdiction.

**EXCEPTIONS:** 1. A permit is not required for exterior rainwater catchment system used for outdoor drip and subsurface irrigation with a maximum storage capacity of 360 gallons (1363 L).  
2. A plumbing permit is not required for rainwater catchment systems for single family dwellings where outlets, piping, and system components are located on the exterior of the building. This does not exempt the need for permits where required for electrical connections, tank supports, or enclosures.

**1702.2.1 Plumbing Plan Submission.** No permit for a rainwater catchment system shall be issued until complete plumbing plans, with data satisfactory to the Authority Having Jurisdiction, have been submitted and approved. ~~No changes or connections shall be made to either the rainwater catchment or the potable water system within a site containing a rainwater catchment water system without approval by the Authority Having Jurisdiction.~~

**Item #4** – *The current Chapter 16 state amendment includes provisions for abandoning rainwater catchment. However, this language does not exist in Chapter 17 of the 2012 UPC. Therefore, a new section 1702.0 should be added by amendment to include this important administrative provision as follows:*

**1702.0 Abandonment.** Where nonpotable rainwater catchment systems are abandoned, the procedure for abandonment shall be as required by the Authority Having Jurisdiction. Components of the abandoned system, including, but not limited to, pipe, tubing, fittings and valves shall not be used for potable water systems.