



Code Amendment Proposal Application

Department of Consumer & Business Services

Building Codes Division

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Oregon.gov/bcd

Read the entire code amendment proposal application before completing this form. Please complete all parts before submitting your proposal and refer to the provided checklist.

APPLICANT INFORMATION

Name: Advanced Code Class, 4th year Apprentices

Date: 10-30-2022

Representing (if applicable): Area 1, Joint Apprenticeship Training Committee

Work phone: 570-1664

Mailing address: 9100 SW McDonald St.

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City: Tigard

State: OR

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Email address: mditty@comcast.net

PROPOSAL INFORMATION

Specialty code: OPSC 2021

Code section(s): 707.9

Briefly explain the subject of your proposal: Remove code language that requires an underfloor cleanout to be located within 5' of the access to the underfloor space.

INSTRUCTIONS AND CHECKLIST

Fill in all the information above and submit this page, signed and dated, with the required supplementary information for Parts I, II, III, and IV described on page 2 of this application. This application may be submitted by mail to the mailing address above, or by email to BCD.PTSPtech@oregon.gov.

Summary checklist for the applicant:

- Part I** Code amendment language is attached in the proper format.
- Part II** Amendment proposal requirements for amending the code have been reviewed.
- Part III** Amendment proposal criteria questions have been answered and are attached.
- Part IV** If applicable, additional ORSC energy efficiency amendment proposal information is attached.

Note: One application is required for each code section you are proposing to amend. If this proposal requires changes in other sections of the code for alignment, include those changes as part of this application.

APPLICANT SIGNATURE

Signature:

Date:

Copyright notice: By signing this Code Amendment Proposal Application, I understand and acknowledge that the work contained in this application is original, or if not original, I have the right to copy the work. By signing this work, I understand that any rights I may have in this work, including any form of derivative works and compilations, are assigned to the Department of Consumer and Business Services Building Codes Division. I also understand that I do not retain or acquire any rights once this work is used in a Department of Consumer and Business Services Building Codes Division publication.

707.9 Clearance. Each cleanout in piping 2 inches (50 mm) or less in size shall be so installed that there is a clearance of not less than 18 inches (457 mm) by 18 inches (457 mm) in front of the cleanout. Cleanouts in piping exceeding 2 inches (50 mm) shall have a clearance of not less than 24 inches (610 mm) by 24 inches (610 mm) in front of the cleanout. Cleanouts in under-floor piping shall be extended to or above the finished floor or shall be extended outside the building where there is less than 18 inches (457 mm) vertical overall, allowing for obstructions such as ducts, beams, and piping, and 30 inches (762 mm) horizontal clearance from the means of access to such cleanout. ~~No under floor cleanout shall be located exceeding 5 feet (1524 mm) from an access door, trap door, or crawl hole.~~

Proposal

1. Describe the concept and purpose of this proposal.

The most controversial code change in the 2021 OPSC is Section 707.9 that requires an underfloor cleanout to be located no more than 5' from the access opening to such crawlspace. The code change proposal submitted will restore the requirements to pre-2021 language which would not require cleanouts to be located within 5' of the crawlspace access.

2. What problem in the existing Oregon code or national model code is this proposal solving? How does this amendment address the issue? If you have evidence demonstrating the problem, submit that information.

Requiring a cleanout to be within 5' of a crawlspace access is without value. Code already requires clearance and access to cleanouts so the additional requirement to provide a cleanout at the crawlspace access is not necessary. The latest energy code requirements have ductwork to be insulated in unconditioned space which means most crawl spaces don't have HVAC in them and the access to the plumbing is greatly increased. In addition, in order to extend a cleanout opening to the crawlspace access requires even more cleanouts (think 135 degrees maximum). The code is requiring 'cleanouts for cleanouts'.

This was a 'UPC' code adoption it was not requested through the Oregon code change proposal process. Oregon is an area where there are many crawlspaces. Other areas served by the UPC do not use a crawlspace method of construction. We are asked to increase the cost of our plumbing installation simply to align with UPC language, not because of a need to solve a legitimate problem.

Has this been proposed at the national model code level. If so, explain when it was proposed, what happened, and why it was not adopted. Provide all associated national model code hearing information and background.

This is UPC language.

Implementation and fiscal impact

1. Explain how the proposed provisions would be enforced? Are additional inspections or permits required?

Enforcement in the usual manner through jurisdictional authority

Describe any necessary equipment, training, tests or special certifications.

No new requirement other than code change class

2. What is the fiscal impact of this proposal? Provide a cost benefit analysis and include the resources or methods you used to determine the fiscal impact.

This would reduce the cost of underfloor plumbing. Additional pipe, fittings, supports and the labor to install them would be reduced.

Impacted stakeholders and other specialty codes

1. It is important that proposals be shared with stakeholders that will be impacted by them. Was this proposal developed with people or organizations likely to be affected by it? Has it been reviewed or shared with people or organizations likely to be affected by it? If so, who, and if not, why not?

It is not known by the submitter if others have attempted to submit any proposal. To this proposer's knowledge there are no stakeholders that will be 'singled out' but this code change. I would guess the Oregon Homebuilders Assoc. would appreciate a cheaper plumbing system.

2. Does this proposal impact other specialty codes or statewide programs?
No.