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Dear Ms. White,

It has recently come to our attention that changes have been made to the Florida Housing Finance Corporation's Universal Design and Visitability Manual. These changes have deviated from the Florida Building Code by requiring an "Anti-scald feature" defined in the sections titled "Faucets" and "Kitchen" which state the following:

Faucets

Feature: Lever handles on all faucets. All faucets must have anti-scald feature.

Sink, bathtub, and tub/shower controls shall be either single faucet or double faucet levers that do not require a strong grip to operate.

Anti-scald features

Sink, bathtub and tub/shower combinations shall have balanced-pressure, thermostatic or combination balanced-pressure/thermostatic valves that conform to the requirements of Standard ASSE 1016 (American Society of Sanitary Engineering) and shall be installed at the point of use. Shower and tub-shower combination valves required by this section shall be equipped with a means to limit the maximum setting of the valve to 120°F (49°C), which shall be field adjusted in accordance with the manufacturer's instructions. In-line thermostatic valves shall not be utilized for compliance with this section. This is in accordance with Florida Building Code, Section 424.3.

Kitchen

Feature: Lever handles on all faucets. All faucets must have anti-scald feature.

Kitchen sink faucets shall be either single faucet or double faucet levers that do not require a strong grip to operate.

Anti-scald features

Sink faucets in the kitchen shall have balanced-pressure, thermostatic or combination balanced-pressure/thermostatic valves that conform to the requirements of Standard ASSE 1016 (American Society of Sanitary Engineering) and shall be installed at the point of use. Kitchen faucet valves required by this section shall be equipped with a means to limit the maximum setting of the valve to 120°F (49°C), which shall be field adjusted in accordance with the manufacturer's instructions. In-line thermostatic valves shall not be utilized for compliance with this section. This is in accordance with Florida Building Code, Section 424.3.

The 2010 Florida Building Code, Section 424.3, states: "Individual shower and tub-shower combination valves shall be balanced-pressure, thermostatic or combination balanced-pressure/thermostatic valves that conform to the requirements of ASSE 1016 or ASME A112.18.1/CSA B125.1 and shall be installed at the point of use. Shower and tub-shower combination valves required by this section shall be equipped with a means to limit the maximum setting of the valve to 120°F (49°C), which shall be field adjusted in accordance with the manufacturer's instructions. In-line thermostatic valves shall not be utilized for compliance with this section."

Per the directions in the Florida Housing Authority's manual, specifying an ASSE 1016 device is not only inappropriate, but impossible to certify to the devices noted in the manual. An ASSE 1016 device is only certified for use in showers and tub/shower combinations.

Section 424.3 only applies to individual shower and tub-shower combinations. There are no code requirements that require additional compensating valves in kitchen or lavatory faucets in the Florida code or any other national plumbing code since the hazard is not as imminent as it is in a shower setting. The Department of Energy requires water heaters to be set at the factory at 120°F. Adding this requirement to the Universal Design and Visitability Manual is unnecessary.

The small containment area of a sink or washing vessel limits exposure to extreme temperatures of water that can easily be avoided. In the case of a shower, an extreme exposure to hot or cold water can result in thermal shock or scalding. A residential sink or washing vessel does not need compensating devices to limit water temperature.

Plumbing Manufacturers International (PMI) urges you to change the requirement of installing compensating valves for kitchen and lavatory faucets in Florida.

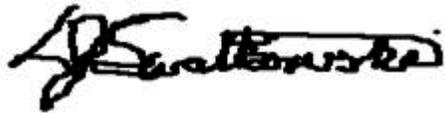
Another issue relates to the requirement of lever handles on all lavatory and kitchen faucets. Many new technologies using capacitive touch, infrared detection and other methods of actuation would be easily accessible by all users regardless if it were a lever or any other type of handle. Plumbing Manufacturers International (PMI) urges you to change the specification of a lever only type of handle in lieu of alternative actuation options.

Plumbing Manufacturers International (PMI) is the international trade association representing the majority of plumbing products sold in this industry. PMI promotes the

efficient use of water while maintaining public health and safety. We represent 31 manufacturers, including well-known companies such as American Standard, Delta Faucet, Kohler, Moen, Symmons, and Toto. Our collective group of manufacturers is responsible for a conservative 90 % of all the products sold in your jurisdiction. PMI is a strong advocate for the safe and efficient use of water, a commitment that is evident in our extensive cooperation with the Environmental Protection Agency's WaterSense Program as a Partner and with organizations such as the Alliance for Water Efficiency.

In summary, PMI strongly endorses efforts to ensure that water is used safely and efficiently. We urge you to revise the language in Universal Design and Visitability Manual to remove the limitation of lever type faucets and the mandate of compensating valves on faucets as noted in the Florida Building Code.

Sincerely,



Len Swatkowski

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PMI MEMBERS INCLUDE: American Standard Brands, Inc. * Amerikam, Inc. * Bradley Corporation * BrassCraft Mfg. Co. * Chase Brass & Copper Company * CSA International * Delta Faucet Company * Dornbracht Americas * Duravit USA * Elkay Manufacturing Company * Fisher Manufacturing Company * Fluidmaster, Inc. * Hansgrohe, Inc. * International Association of Plumbing and Mechanical Officials * InSinkErator * Kohler Company * KWC America, Inc. * Lavelle Industries * LSP Products * Moen Incorporated * Mueller Brass Company * NEOPERL, Inc. * Pfister * Sloan Valve Company * Speakman Company * Symmons Industries Inc. * T & S Brass and Bronze Works, Inc. * TOTO USA * Vitra USA * Water Pik * WCM Industries, Inc.