Bobby Jindal
GOVERNOR

Bruce Greenstein
SECRETARY

State of Louisiana

Department of Health and Hospitals
Office of the Secretary

September 28, 2010

Glenn T. Cambre, Director
Center for Environmental Health Services
Office of Public Health
Department of Health and Hospitals
628 N. 4th Street
P.O. Box 4489
Baton Rouge, Louisiana 70821-4489

Re: Letter of Intent – Adoption of ASME Standard A112.3.1 – 2007 - Stainless Steel Drainage Systems for Sanitary Drain, Waste, and Vent (DWV), Storm, and Vacuum Applications, Above and Below Ground

Dear Mr. Cambre:

It has recently come to my attention that ASME Standard A112.3.1 – 2007 establishes material, dimensional, mechanical, and physical requirements for stainless steel pipe, fittings, and joints for use in sanitary DWV, storm, and vacuum drainage systems which are currently not included in Part XIV (LA State Plumbing Code, 2000 edition) of the Louisiana State Sanitary Code (LAC 51). This standard specifies the use of Type 304 (for above-ground applications only) and Type 316L stainless steel for use in sanitary DWV, storm, and vacuum drainage systems. (It should be noted that the use of Type 304/304L and Type 316/316L stainless steel pipe conforming to ASTM A778 and ASTM A312 has recently been approved by the undersigned for use in potable water service and distribution systems.)

It is my understanding, based upon your staff's research and recommendations, that Type 304 and Type 316L stainless steel meeting ASME A112.3.1 is a viable material option for drainage piping when installed according to the manufacturer's instructions, the requirements of the LA State Plumbing Code, 2000 edition, and in accord with the constraints/notes listed below. Approving the use of drainage piping meeting this standard will provide design and installation professionals an additional safe and reliable material option in the construction of sanitary DWV systems. Therefore, it is my intent to adopt performance standard ASME A112.3.1 for sanitary DWV, storm, and vacuum drainage systems with the following constraints/notes:

1. The following fittings included in ASME A112.3.1-2007 are prohibited from use for drain and waste piping by existing requirements contained in the LA State Plumbing Code, 2000 edition (LSPC):

    a. Table 14 – Stainless Steel, 89-deg Bend (2 inch fitting is prohibited).

b. Table 19 – Stainless Steel, 89-deg Tee (all sizes prohibited).

c. Table 20 – Stainless Steel, 89-deg Sweep Tee (all sizes prohibited).

d. Table 21 – Stainless Steel Cross (all sizes prohibited).

e. Table 22 – Stainless Steel Tee with Side Inlet (all sizes prohibited).

f. Table 23 – Stainless Steel Tee with Side Clean-out (all sizes prohibited).

g. Table 24 – Stainless Steel Tee with Rear Clean-out (all sizes prohibited).

h. Table 41 – Stainless Steel, Side Outlet, Floor Drain Square Profile (all sizes prohibited).

i. Table 42 – Stainless Steel, Side Outlet, Floor Drain Round Profile (all sizes prohibited).

j. Table 46 – Stainless Steel, Floor Drain Water Trap (all sizes prohibited).

NOTE: The stainless steel eccentric reducers listed in Table 28 shall be installed in-line with the upstream flow so as not to create turbulence in the downstream flow from a waterfall effect and shall also be installed in-line of the air flow of the smaller diameter vent when used as part of the vent system.

2. Stainless steel Type 304 shall not be installed underground and shall be kept not less than six (6) inches (152 mm) above ground.

3. Stainless steel Type 316L shall be allowed for above-ground and below-ground applications. Dependent upon the specific discharge effluent which the pipe is to convey, Type 316L stainless steel may be required to be used above ground in lieu of Type 304 (see manufacturers' recommendation for the application).

4. For either Type 304 or 316L stainless steel pipe and fittings, the selection of the appropriate internal sealing ring ("O" ring) material for the application shall be determined by a Louisiana licensed engineer or ascertained by the manufacturer.

5. Any vacuum drainage system is considered an Alternate Designed Plumbing System under Chapter 12 of the LSPC, therefore, any approval of a vacuum drainage system using this material shall still be subject to a special prior approval under Chapter 12 requirements prior to installation.

6. The installation of stainless steel drainage systems for sanitary DWV, storm, and vacuum drainage applications shall be performed in strict accordance with the LSPC and the

manufacturers' installation instructions. In instances where the LSPC and the manufacturers' installation instructions conflict, the more stringent provisions shall prevail.

7. The acceptance of this standard under this letter shall not be construed as an approval of this material for use as acid soil and waste piping under Section 703.6 of the LSPC.

8. Piping which is expected to condense water vapor from its surroundings should be insulated to prevent structural damage to the building.

Please ensure that copies of this letter are circulated to your staff and others as appropriate. Should questions arise, they should be directed to Mr. Jake Causey, P.E., Acting Chief Engineer, Engineering Services Section, Center for Environmental Health Services, Office of Public Health. Mr. Causey may be reached at (225) 342-7499.

Very truly yours,

Jimmy Guidry, MD.

Jimmy Guidry, M.D.
State Health Officer

JG/JKH/JKC/jkc

cc: Jake Causey, Acting Chief Engineer, Engineering Services Section, CEHS, OPH
Jeremy Harris, Engineer, Engineering Services Section, CEHS, OPH
District/Regional Engineers, Engineering Services Section, CEHS, OPH
Tenney Sibley, Chief Sanitarian, Sanitarian Services Section, CEHS, OPH
Sidney Becnel, Legislative Liaison & Rulemaking Manager, CEHS, OPH
Rene' Chedraui, Sr., Director, Division of Architectural & Engineering Services, DHH
State Plumbing Board of Louisiana c/o John Barker, Executive Director
State Licensing Board for Contractors c/o Charles G. Marceaux, Executive Director
H. "Butch" Browning, Jr., State Fire Marshal, Office of the State Fire Marshal, Department of Public Safety and Corrections
Joe DeLaune, Architect, Chief Building Official, Building Official Plan Review Division, Office of the State Fire Marshal, Department of Public Safety and Corrections
Louisiana State Uniform Construction Code Council c/o Denise C. Jobe, Administrator, c/o Office of Management and Finance, Department of Public Safety and Corrections
Louisiana Professional Engineering and Land Surveying Board c/o Donna D. Sentell, Executive Secretary
Louisiana Engineering Society c/o Brenda Gajan, Executive Director
Louisiana Board of Architectural Examiners c/o Mary "Teeny" Simmons, Executive Director
AIA Louisiana c/o Lynn B. Robertson, Executive Director
American Society of Plumbing Engineers, New Orleans Chapter, c/o Ollie French
Local Plumbing Inspectors (from S. Becnel's Excel list)