

Chairman Dilan and Members of the City Council Committee on Housing and Buildings:

As the Financial Secretary-Treasurer of UA Plumbers Local 1, I would like to extend our gratitude for holding today's hearing to consider Int. 874. This much needed legislation would amend the administrative code of New York to address the lack of regulation for recently developed piping systems designed for the venting of dangerous methane and radon gases. While this Union was and remains a supporter of the current and recently adopted administrative code, oversights in the current code implicates potential safety or health hazards associated with the installation of new methane and radon gas piping systems. The adoption of Int. 874 would ensure that the highest level of safety and expertise are utilized in the installation and modification of all piping systems.

Int. 874 is consistent with the goals of the New York City administrative code, which has recognized and regulated the installation of plumbing and mechanical systems for the past 70 years. Specifically, Int. 874 will extend provisions of the current code to (1) ensure that only licensed professionals install new piping systems, (2) to require that the Department of Buildings ("DOB") provide oversight to the mechanical joints that are used in the installation of water service, water distribution,

drainage and vent piping in New York City, and (3) to further require the DOB to provide oversight to the installation of any piping system that is not designed to the specific code requirements.

While the current code permits only licensed master plumbers to install, alter, or repair water supply, medical gas, fuel gas or sanitary drainage and vent piping, no such provision is contained for these new piping systems. Section 1 of Int. No. 874 would fill that gap and require that licensed plumbers install these new systems. Such a requirement ensures that the best trained and most qualified persons install all of New York City's venting systems.

For example, under the old plumbing code, with the exception of screw pipe, the most common method of joining brass or copper water pipe was soldering or brazing. The requirements for soldering and brazing are specific. The new plumbing code now permits piping to be joined by mechanical means. The only safety requirement for these new means is that they be "installed in accordance with the manufacturer's instructions." There are numerous types of mechanical joining systems available today. This presents significant safety and health issues because it gives to manufacturers the sole discretion to determine whether their own mechanical systems are safe. To allow manufacturers to self-regulate, removes any

objective or meaningful oversight of the installation process. Int. No. 874 would require that manufacturers obtain approval from the DOB commissioner before new mechanical joining systems for water service, water distribution, drainage and vent systems are used in New York City.

Furthermore, the previous plumbing code required that the design of venting systems conform to certain code specifications. The new plumbing code permits computer program designed venting systems that are different than the minimum code requirements. Again, there is no oversight of the design of the venting systems, which creates numerous health and safety issues. Int. No. 874 would require that the DOB review all designs that do not meet the minimum standards of the code and provide approval before installation.

Given the importance of plumbing and piping systems and the welfare of our City, we ask that you support Int. No. 874 because it addresses important safety concerns that the new plumbing code has simply overlooked.