CSI - Ohio

The Common Sense Initiative

Business Impact Analysis

Agency Name: Ohio Board of Building Standards

Regulation/Package Title: Ohio Plumbing Code

Rule Number(s): 4101:3-2-01, 4101:3-3-01, 4101:3-4-01, 4101:3-6-01, 4101:3-10-01, 4101:3-13-01

Date: August 27, 2013

Rule Type:

- ☐ New
- X Amended
- ☐ 5-Year Review
- ☐ Rescinded

The Common Sense Initiative was established by Executive Order 2011-01K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Regulatory Intent

1. **Please briefly describe the draft regulation in plain language.**
   Please include the key provisions of the regulation as well as any proposed amendments.

   The Ohio Board of Building Standards (Board) proposes to amend Ohio Administrative Code (OAC) Rules as follows:

4101:3-2-01 to modify definition of "approved agency" consistent with proposed change in the Ohio Building Code and to delete definition of lead-free pipe and fittings as a result of the federal law change effective January 4, 2014.

4101:3-3-01 to add exception for shower liner test for one-, two-, and three- family dwellings.

4101:3-4-01 to add exception for shower liner test for one-, two-, and three- family dwellings.

4101:3-6-01 to address new lead content of drinking water pipe and fittings by referencing NSF 372 as a result of federal law change effective January 4, 2014.

4101:3-10-01 to reference barrier-type trap seal protection device as a result of approved Petition #13-003 and to add trap primer exception for one-, two-, and three family dwellings.

4101:3-13-01 to add standard NSF 372-2010 which is the standard used to evaluation the weighted average of lead as a result of federal law change effective January 4, 2014.

2. **Please list the Ohio statute authorizing the Agency to adopt this regulation.**

   Revised Code § 3781.10: http://codes.ohio.gov/orc/3781.10

3. **Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?**
   If yes, please briefly explain the source and substance of the federal requirement.

   Yes. Section 1417 of the Safe Drinking Water Act was amended in 2010 by Public Law 111-38 to change the definition of lead free from not more than 8 percent lead to not more than a weighted average of 0.25 percent. The effective date of this change is January 4, 2014. The proposed changes coordinate the plumbing code definitions with this definition and includes standard NSF 320 used to evaluate the weighted average of lead.

4. **If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.**

   Not applicable.

5. **What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?**

Revised Code § 3781.06 requires that all buildings used as a place of resort, assembly, education, lodging, dwelling, trade, manufacture, repair, storage, traffic, or occupancy by the public, and all other buildings shall be safe and sanitary. This rule package sets forth the construction standards for nonresidential buildings to ensure that new construction is safe and sanitary.

6. **How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?**

   The enforcement of these rules will be implemented by certified township, city, and county building departments. Rule 4101:1-1-01 lays out the administrative procedures certified building departments must follow to implement the substantive requirements of these rules to determine compliance. These provisions require a builder or owner to make application to a building department to obtain an approval to build (permit). As part of this application the owner must submit sufficient information and/or construction documents for the building official/plans examiner to determine whether the proposed work complies with the code. After the builder or owner obtains the approval (permit), construction may commence and the building department inspectors will inspect the construction to ensure that the work conforms with the original approval. Rule 4101:1-1-01 § 105.2 provides that in the absence of fraud or a serious safety or sanitation hazard, any residential structure built in accordance with approved plans shall be conclusively presumed to comply with these rules. The Board requires that certified building departments submit an annual yearly operational report which lists the following information: current employees and their certifications, total number of permits issued during the year for single family, two-family, and three family, total number of inspections made, the total value of construction, and the total number of appeals of the code requested by a builder or owner during the year.

Development of the Regulation

7. **Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.**
   If applicable, please include the date and medium by which the stakeholders were initially contacted.

   Continuing law in Rule 4101:3-13-01 was previously reviewed by the Common Sense Initiative (CSI) Office. On October 31, 2012, the CSI Office issued a memorandum making no recommendations regarding this rule and concluded that the Board should proceed with formal rule filing with the Joint Committee on Agency Rule Review.

   On July 8, 2013, the Board sent an email to all agency stakeholders informing them of a scheduled stakeholder meeting on July 19, 2013 to hear comments and respond to questions on these rules. The email and stakeholder distribution list are attached as Exhibit A. The notice summarized the proposed amendments and also informed stakeholders that they if

they could not attend the stakeholder meeting, they could submit questions or comments via email or regular mail by July 31, 2013. On July 19, the Board conducted a stakeholder meeting on the proposed rules between 11:00 AM and 12:00 PM and the following individuals attended: Richard Lecher, IBI and Dave Redinger, Resource International Inc.

8. **What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?**

   No comments were submitted related to these rules.

9. **What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?**

   Continuing law is based on the 2009 International Plumbing Code (IPC) promulgated and amended by the International Code Council (ICC). The model codes developed by ICC are updated every three years through a process that incorporates petitioning, public hearings and voting by ICC members. The ICC Committees that oversaw the development of the different provisions 2009 IPC included code officials, engineers, plumbing contractors, and representatives from the National Association of Home Builders, insurance industry, and other professional organizations.

   When a petition to amend the model code is submitted, the proponent of the change must submit the proposed language of the amendment, the reason for the amendment including scientific data when applicable, and the cost impact of the amendment. All submitted petitions are then published prior to initial code development hearings on the petitions. Interested persons may review the proposed changes and attend the code development hearing and provide comments. A report then is published on the public hearings for review and then final action is taken on the proposed changes at final action hearings. All successful changes are incorporated into the next edition of the model code.

   Upon publication the Board's code committee reviews each substantive change included in the newest edition of the code and determines whether to recommend the change to the Board for adoption. The Board last fully updated the Ohio Plumbing Code on November 1, 2011.

10. **What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?**

    The proposed changes included in this rule packages are the result of federal law change to list previously approved plumbing requirement exemptions for 1-, 2-, 3- family to plumbing code users (contractors/inspectors). To not make these changes would prevent designers and building owners from taking advantage of these clarifications.

11. Did the Agency specifically consider a performance-based regulation? Please explain. ***Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.***

Continuing law permits a registered design professional's alternative engineered design to be a compliance alternative method to the prescriptive requirements of the code. Section 106.5 of the Ohio Building Code permits a registered design professional to submit sufficient technical data to substantiate that performance of the proposed alternative engineered design meets the intent of the code. Additionally, Ohio Building Code § 107.4.3 provides that when construction documents have been prepared by an Ohio registered design professional conforming to the requirements of the rules of the Board pertaining to design loads, stresses, strength, and stability and other requirements involving technical analysis, the documents need only be examined to the extent necessary to determine conformity with other requirements of the rules of the Board.

12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

Editorial changes are routinely made to the rules to provide consistency with the Ohio Revised Code and other Board and agencies' rules. The rules included in this package are intended to coordinate with federal law and duplicate exceptions to the residential plumbing requirements currently only located only in the Residential Code of Ohio. Plumbing contractors and inspections routinely only work out of the plumbing code. Exceptions to certain plumbing requirements for 1-, 2-, 3 family recommended by the Residential Construction Advisory Committee and adopted by the Board effective January 1, 2014 are only listed in the Residential Code of Ohio. Adding the exceptions to the plumbing code rules will make it easier for the plumbing contractors/inspections to be made aware of the exceptions.

13. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

These rules are enforced by both certified building departments and local health districts. The Board certifies plumbing inspectors who work in certified local building departments and the Division of Industrial Compliance (DIC) certifies plumbing inspectors who work in health districts. All certified plumbing inspectors must complete continuing education to maintain their certifications and continue to be authorized to enforce these rules. The Board and DIC has authority to suspend or revoke certifications for failure to properly enforce the rules. Also, the Board has a staff member dedicated to responding to complaints by persons affected by the Board rules.

Adverse Impact to Business

14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

a. Identify the scope of the impacted business community;

The Board does not estimate an increased cost to the business community to comply with the substantive changes in the rules. Other potential impacts include time spent to familiarize oneself with the substantive changes and the purchasing of the update pages for code books.

b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and

See above.

c. Quantify the expected adverse impact from the regulation.

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a "representative business." Please include the source for your information/estimated impact.

Cost to purchase update pages for a code book is approximately $24. However, the Board does post adopted amendments to the Board's rules on its website and provides free online access to eCodes via a link from the Board's website:

http://publicecodes.cyberregs.com/st/oh/st/OH-P-2011-000004.htm

15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The proposed changes are intended to incorporate federal statutory changes and exceptions to plumbing requirements for 1-, 2-, 3- family dwellings currently only listed in the Residential Code of Ohio.

Regulatory Flexibility

16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

The rules do not have special exemptions or alternative means of compliance specifically for small business. Rule 4101:1-1-01 § 109 requires a building official to issue an adjudication order to an owner when the design or construction of a building does not comply with the Ohio Building Code (plumbing code rules are applicable through reference from the building code and residential code). The adjudication order must comply with Revised Code Chapter 119 and give the owner an opportunity to appeal. This mechanism is often utilized by an owner voluntarily to obtain a variance from the requirements.

Also, Rule 4101:1-1-01 § 106.5 permits alternative engineered designs prepared by a registered design professional to not strictly comply with the prescriptive requirements of the rules. To obtain approvals based on alternative engineered designs, the design professional must submit sufficient technical information to demonstrate that the performance meets the intent of the rules.

17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Revised Code § 3781.102 does not authorize the Board to set the fees and/or penalties assessed by local certified building departments in connection with the enforcement of these rules. Compliance with the rules is accomplished through construction conforming to the certificate of plan approval (permit). Therefore, there are no potential paperwork violations of these rules.

18. What resources are available to assist small businesses with compliance of the regulation?

The Board's technical staff spends approximately 25% of their time responding to questions on the building codes and educating design professionals, contractors, the public, and code officials of the intent of the Board's rules assisting all parties in compliance.
Also, it is the intent of the Board's rules that they be liberally construed. Rule 4101:1:1-01 states:
The rules of the board and proceedings shall be liberally construed in order to promote its purpose. When the building official finds that the proposed design is a reasonable interpretation of the provisions of this code, it shall be approved. Materials, equipment and devices approved by the building official pursuant to section 114 shall be constructed and installed in accordance with such approval.

Exhibit A

Hanshaw, Regina

From: Lane, Michael
Sent: Monday, July 08, 2013 4:58 PM
To: Lane, Michael
Cc: Hanshaw, Regina; Jackson, Felecia; Regoli, Steve; Ohler, Debbie; Johnson, Robert; Sokolnicki, Jan
Subject: Board of Building Standards Proposed Rule/Stakeholder Meeting Notification

Board of Building Standards Stakeholder:

You are receiving this message pursuant to the requirements of Executive Order 2011-01K and Ohio Revised Code Chapter 107, which require state agencies, including the Ohio Board of Building Standards (Board), to draft rules in collaboration with stakeholders, assess and justify any adverse impact on the business community, and provide opportunity for the affected public to provide input on the rules.

Stakeholder Meeting

The Board will conduct a Stakeholder Meeting to hear comments and respond to questions on the proposed amendments summarized below on July 19, 2013 from 10:00 AM to 1:00 PM in Training Room 1, 6606 Tussing Road, Reynoldsburg, Ohio 43068. All interested stakeholders are invited to attend. The Agenda for the Meeting is as follows:

10:00 AM – 11:00 AM	Proposed Certification Rules (Building Department Personnel Requirements)
11:00 AM – 12:00 PM	Proposed Certification Rules (Board Recognized Accreditation Bodies) Proposed Ohio Building Code Rules Proposed Ohio Plumbing Code Rules
12:00 PM – 1:00 PM	Proposed Residential Code of Ohio Rules

Overview of Proposed Rules

Proposed Certification Rules
The Board proposes to amend Ohio Administrative Code as follows: 4101: 7-1-01 to add reference to proposed new rule 4101:7-6-01; 4101:7-3-01 to revise building department personnel certification requirements; and 4101:7-6-01 to coordinate with new Section 114 of the Ohio Building Code (OBC) and prescribes requirements for board recognition of accreditation bodies, conformity assessment bodies, and industry trade association certification programs
These proposed rules can be viewed here:
http://www.com.ohio.gov/dico/docs/dico_ProposedCertificationRulesCombined.pdf

Proposed Ohio Building Code Rules
The Board proposes to amend Ohio Administrative Code as follows: 4101:1-1-01 to clarify exemption for amusement park rides and refer to Ohio Revised Code § 1711.50, to clarify that the installing contractor of fire protection systems are to be certified by the State Fire Marshal, to replace product approval language, and to make general editorial corrections; 4101:1-2-01 to revise the definitions of amusement park rides, approved agency, dwelling and dwelling unit, special inspection agency, and special inspector; 4101:1-3-01 to clarify that 1-, 2-, 3 family dwellings should not share an exit, clarify that R-1 congregate living facilities are not permitted to use the Residential Code of Ohio (RCO), clarify that R-2 living facilities are not permitted to use the RCO, revise

definitions of dwelling and dwelling unit to be consistent with the RCO, and to make general editorial corrections; 4101:1-10-01 to modify the means of egress width requirements as a result of approved Petition # 12-001 and to modify controlled egress locks provision for I-2 Occupancy as a result of approved Petition #13-001; 4101:1-11-01 to modify accessibility provision to further coordinate with federal accessibility requirements; 4101:1-13-01 to modify the 2009 IECC related to fireplace doors, air barriers, and swimming pool accessories; and 4101:1-17-01 to revise and move definition of approved agency, add definition of special inspection agency, add definition of special inspector, delete Section 103 and refer to Section 114.3, clarify Section 1704.1, and clarify fabricator requirements consistent with new Section 114 and 1702.1 definitions.
These proposed rules can be viewed here:
http://www.com.ohio.gov/dico/docs/dico_CombinedOBCdraftrulesforstakeholdermtg.pdf

Proposed Ohio Plumbing Code Rules
The Board proposes to amend Ohio Administrative Code as follows: 4101:3-2-01 to revise the definitions of approved agency and delete the definition of lead-free pipe as a result of federal law change effective January 1, 2014; 4101:3-3-01 to include exception for shower liner test for 1-, 2-, 3- family dwellings consistent with the RCO; 4101:3-4-1 to include exception for shower liner test for 1-, 2-, 3- family dwellings consistent with the RCO; 4101:3-6-1 to revise Section 605.2 related to lead content of drinking water pipe and fittings adding reference to NSF 372 consistent with federal law change effective January 1, 2014; 4101:3-10-1 to add reference to barrier-type trap seal protection device as a result of approved Petition # 13-003 and to add trap primer exception for 1-, 2-, 3 family dwellings consistent with the RCO; and 4101:3-13-01 to add standard NSF 372-2010.
These proposed rules can be viewed here:
http://www.com.ohio.gov/dico/docs/dico_CombinedOPCdraftrulesforstakeholdermtg.pdf

Proposed Residential Code of Ohio Rules
The Board proposes to amend Ohio Administrative Code as follows: 4101:8-1-01 to clarify that model homes are within the scope of the RCO, to clarify that 2- & 3- family dwellings that share an exit are within the scope of the OBC, not the RCO, to reference Chapter 29 for non-required fire protection systems, to replace entire Section 103 with a reference to 4101:7, to clarify that the installing contractor of fire protection systems are to be certified by the State Fire Marshal, to mirror proposed OBC Section 114 product approval process language, to mirror OBC Board Organization Section 116, and to make general editorial corrections; 4101:8-2-01 to revise definitions of approved agency, dwelling, dwelling, one- two-three family, dwelling unit, exit, fire separation distance, and add definition for residential building; 4101:8-3-01 to reorganize Section 314 and add language to allow wireless smoke alarms in certain existing conditions, to clarify intent of carbon monoxide alarm requirements, to add beam and header to diagonal cross bracing/girt attachment in Table 324.7, to clarify that roof truss designs must account for all imposed loads required by Section 324.8, and to make general editorial corrections; 4101:8-4-01 to make general editorial corrections; 4101:8-5-01 to make general editorial corrections; 4101:8-6-01 to add new simplified bracing section from 2012 International Residential Code and to make general editorial corrections; 4101: 8-11-01 to modify IECC Table 402.4.2 and IECC Section 402.4.3 for fireplaces consistent with proposed International Residential Code change RE86-13 and to delete reference to air-permeable insulation in the first row, to delete references to pools as they are not currently within the scope of the RCO, to incorporate fireplace language from proposed International Residential Code change RE86-13, and to make general editorial corrections; 4101:8-15-01 to make general editorial corrections; 4101:8-20-01 to delete reference to pools heaters as pools are not currently within the scope of the RCO; 4101:8-44-01 to update reference to Ohio Plumbing Code to include March 1, 2013 amendments, to delete NFPA 70 TIA related to pools and spas as they are not currently within the scope of the RCO, to update ASME standards, and to make general editorial corrections.
These proposed rules can be viewed here:
http://www.com.ohio.gov/dico/docs/dico_CombinedRCODraftrulesforstakeholdermtg.pdf

Contact Information for Comments or Questions

If you cannot attend the above Stakeholder Meeting, you can submit written comments or questions on the proposed amendments to the Board. You may submit your comments via email at BBS@com.state.oh.us or U.S.

Mail at Ohio Board of Building Standards, 6606 Tussing Rd, Reynoldsburg, Ohio 43068, Attn: Regina Hanshaw by July 31, 2013.

Sincerely,

Regina S. Hanshaw
Executive Secretary
Ohio Board of Building Standards

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* The information transmitted is intended solely for the individual or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of or taking action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you have received this email in error please contact the sender and delete the material from any computer.
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APPENDIX L Continued

BBS Stakeholder Emails

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Residential Code Advisory Board

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