

As Seen In



# PME Letters

## When the Code Doesn't Work: Another Perspective

I am writing to comment on Julius Ballanco's recent column, "When the Code Doesn't Work" (Nov. 2007). Unfortunately, his report does not include the facts as viewed by this office. Hopefully, this information will assist in your readers' understanding of the resulting decision and the reasons supporting that decision.

The Bureau of Construction Codes, State of Michigan, requested standards conformance documentation several years ago for no-hub cast iron soil pipe used in a project inspected by this office following a request from a designer related to state-inspected school projects. Several suppliers of product manufactured in China who import these materials provided test reports that were used in obtaining product listings to support the acceptance of these products.

The original lab reports used in these listings for the importers contained serious discrepancies. Over an extended time period, the test reports were revised in order to address errors cited in evalu-

ations to gain the commission's approval. It became evident that the role of this agency was being misapplied as a reviewer of the reports in order to identify errors for corrections.

This agency is responsible for the evaluation of products and material for use in the State of Michigan, not as a third-party evaluator of reports. The reporting errors resulted in the Michigan State Plumbing Board establishing acceptance criteria to assure standard conformance.

The criteria and standards conformance has not been demonstrated to date. One of the most basic illustrations is that two Dimensional Inspection Reports separated by one year and 10 months are identical in every dimension to hundredths of an inch from one of the manufacturers. This was brought to the attention of all parties and has not been addressed to the satisfaction of this office or the State Plumbing Board.

This agency has filed a formal complaint with ANSI to resolve these issues in an effort to assure consumers have acceptable products conforming to code-

required standards. Ballanco's article referred to this office being uncomfortable with the submitted materials. This is an unfortunate characterization. It was demonstrated during the evaluation that the products do not conform to the required standards. Unfortunately, this greater analysis has led to the bureau's lack of confidence in the conformance and reporting processes.

The evaluation of this product has been very time consuming and expensive for all parties. The agency has relied upon the professional judgment of appointed boards and professional staff to evaluate the submissions and pose the necessary questions to seek validated information to support the acceptance of the product. It would have been a much easier route to simply accept products rather than completing the in-depth study, which has confirmed our position. **PME**

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