

Hello,

I have presented my remarks in the public hearing today. I wanted to forward you the text of my remarks for inclusion in the record.

Thank You

Administrative Rules for Part 7 Plumbing Code Rules

Rule Set 2019-117 LR

In review of the proposed rule changes, I would like to raise an objection to the deletion of substantial portions of the administrative section (chapter 1) of the Plumbing Code. These sections identified for deletion have existing in the model code and MI versions of that code since the promulgation of the 2000 codes. Similar language has also been a part of the MI adopted codes from the formation of PA 230 Of 1972 without being modified by administrative rules. Why is it now that the director has determined to throw out over 50 years of precedence and claim that these sections of code are in contradiction to the Act? I ask the director to respond with reasoning for the deletions, and specific reasoning for each of the following sections identified for deletion from the 2018 International Plumbing Code.

103.1 to 103.3

104.2

104.5 to 104.7

105.1

105.3 to 105.3.3

106.3

106.3.2

106.3.3

106.5.5

108.3

108.5

109.1

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