

MEMORANDUM

TO: All Interested Parties
FROM: Enrique Gonzalez, Staff Liaison
DATE: July 18, 2017
SUBJECT: Proposed TIA (Log No. 005-15) to UNIFORM MECHANICAL CODE, Section 603.4.1.

In accordance with the IAPMO Regulations Governing Committee Projects, the attached proposed Tentative Interim Amendment (TIA) to the 2015 edition of the UNIFORM MECHANICAL CODE is being submitted for public comment. The TIA (Log No. 005-15) is on UMC, Section 603.4.1.

We invite all interested parties to review the proposed TIA. If you wish to submit a comment in regards to this TIA, fill out the [TIA Comment Form](#). Email the completed form to enrique.gonzalez@iapmo.org. The closing date for submitting comment forms for this TIA is Friday, July 28, 2017.

Thank you for your time and interest in the development of the Uniform Mechanical Code.

In accordance with the IAPMO [Regulations Governing Committee Projects](#) this, a proposed TIA which has been submitted for processing pursuant to 5-1 of the Regulations, will be automatically docketed as an appeal on the agenda of the IAPMO Standards Council. Any party may advocate their position before the Council. Please note that most Council meetings are held via teleconference.

Parties wishing to address the Council shall notify the Council Secretary no later than 48 hours prior to the Council meeting. Although not required, parties wishing to advocate a position are encouraged, to the extent practicable, to file written submissions in general conformance with sections 1-6.3 and 1-6.4 of the Regulations in advance of the meeting at which action will be considered.

When an automatically docketed appeal has not been pursued by any party, the Council will not consider the matter as an appeal.

This TIA will be on the Council agenda schedule – August 30, 2017.

FORM FOR TIA COMMENT ON IAPMO UPC/UMC COMMITTEE DOCUMENT

NOTE: All comments MUST be received by 5:00 PM PST on Friday, July 28, 2017.

For further information on the standards-making process, please contact
Codes and Standards Administration at 909-472-4110

For technical assistance, please call IAPMO at 909-230-5535

FOR OFFICE USE ONLY

RESP # : _____

DATE REC'D: _____

Date: _____ Name: _____ Telephone #: _____

Company: _____

Street Address: _____ City: _____ State: _____ Zip: _____

Please Indicate Organization Represented (if any): _____

1. a) IAPMO Document Title: Uniform Mechanical Code Document Year: 2015

b) Section/Paragraph: Section 603.4.1

c) Comment on TIA: UMC 005-15

2. Comment Recommends (check one): AGREE DISAGREE

3. Substantiation for Comment:

Signature (**Required**): _____

Please use separate form for each comment.

INSTRUCTIONS FOR SUBMITTING COMMENTS
– PLEASE READ CAREFULLY –

1. Complete form digitally by filling in each item described.
2. Check the appropriate box to indicate whether this comment recommends agreeing or disagreeing with the proposed TIA.
3. In the space title “Substantiation for Comment”, state the reason for your comment.
4. Sign the comment. (Required)

NOTE: The IAPMO Regulations Governing Committee Projects in Section 5-4(c): All public comments, ballots, and comments on ballot on the proposed TIA shall be summarized in a staff report and forwarded to the Council for action in accordance with Section 5-5.



UNIFORM MECHANICAL CODE TIA FORM

Reference Code Section: 2015 UMC Section 603.4.1

Submitter(s) Name: David Dias

Company: Sheet Metal Workers' Local Union 104
Address: 2610 Crow Canyon Road, Suite 300, San Ramon, CA 94583
Phone number: 925-208-2905

Submitter(s) Name: Eli Howard

Company: SMACNA
Address: 4201 Lafayette Center Drive Chantilly, Virginia 20151-1219
Phone number: (703) 803-2980

Proposed language for TIA:

Amend Section 603.4.1 of the 2015 UMC to read as follows:

603.4.1 Length Limitation. Factory-made flexible air ducts and connectors shall be not more than 5 feet (1524 mm) in length and shall not be used in lieu of rigid elbows or fittings. Flexible air ducts shall be permitted to be used as an elbow at a terminal device.

Exception: Residential occupancies.

Substantiation:

Technical Merit:

The original proposal and TC discussion on flexible duct focused on the need to eliminate the use of flexible duct in lieu of rigid elbows for the purposes of changing direction in runs of ductwork. It was neither the intent of the proposer nor did the data provided to the TC justify the inclusion of a rigid elbow requirement for terminal connections. The language adopted by the TC in 603.4.1 is incomplete and is being misinterpreted as such to require the mandated use of a rigid elbow for terminal connections. The use of flexible duct for terminal connections is in fact appropriate as long as it is installed in compliance to the UMC and SMACNA HVAC Duct Construction Standard. Further, the use of flexible duct for terminal connections uniquely allows for the proper sound attenuation to be maintained at the terminal airflow exit to the conditioned space.


Emergency Nature:

The evaluation of emergency nature findings corresponds to Section 5-2(a) and Section 5-2(f) of the IAPMO Regulations Governing Committee Projects.

Proposers and IAPMO technical committee never intended during adoption for this to be read as a ban on the use of flexible duct for connections to terminals and/or registers. Enforcement confusion in the field is leading to unnecessary costs and penalties to contractors and customers. Designers/Commissioning Agents have also been impacted over the proper method to specify the connection and length of flexible duct for final connections to the terminals and/or registers.

This clarification will provide structure to the industry and reduce the cost burden now impacting all parties. For these reasons, this issue cannot wait for the next code cycle to be resolved.

I hereby grant IAPMO all and full rights in copyright, in this proposal, and I understand that I acquire no rights in any publication of IAPMO in which this proposal appears in this or another similar or analogous form.

Submitter signature (required):  Date: 6-27-17
Eli Howard, SMACNA

Submitter signature (required):  Date: 6-27-17
David Dias, Sheet Metal Workers Local 104

Mail to: Codes Department • IAPMO • 4755 E. Philadelphia Street • Ontario • CA • 91761-2816
FAX: 909-472-4198 or 909-472-4246