Code Amendment Proposal Form
For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

CONTACT INFORMATION

Name: Michael G. Montoya  Date: 04/24/19
Phone:(O)720-865-2620; (C)720-233-1247  E-mail: michael.montoya@denvergov.org
Organization: City & County of Denver

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Signature:

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IRC

If you submitted a separate coordination change to another code, please indicate which code: ________________

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-xxxx</td>
<td>Denver Building Code–xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)</td>
</tr>
<tr>
<td>IBC</td>
<td>International Building Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: ☐

Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is BOLDING, STRIKEOUT AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

| Code Sections/Tables/Figures Proposed for Revision: |
| IRC 3111.1 |

Note: If the proposal is for a new section, indicate (new).

Proposal:

Add new text as follows:

P3111.1 Type of Fixtures A combination waste and vent system shall only serve floor drais, sinks, lavatories and drinking fountains. A combination waste and vent system shall not receive the discharge of a food waste disposer. A combination
waste and vent system shall be considered to be the vent for those fixtures. The developed length of a fixture drain to the combination waste and vent systems piping shall not exceed the limitation of Table P3105.1.

**Note:** Show the proposal using **strikeout**, underline format. At the start of each section, give one of the following instructions:
- Revise as follows:
- Add new text as follows:
- Delete and substitute as follows:
- Delete without substitution:

**Supporting Information:**
Like wet vents and circuit vents, a combination waste and vent system is another variation of “wet” venting. Although the specific requirements for each are unique, all of the ‘wet’ venting means (circuit, wet and combination) utilize the same basic principle of oversized drains with ample space for air flow above the waste flow.

To prevent blockages, such systems are intended to receive only clear and gray water wastes. Because of the low-flow velocities and volumes that occur in these systems, any solids introduced would accumulate, causing blockages and reduction of the cross-sectional area of the piping. Ground food waste might collect in the drain, causing blockages. Combination waste and vent systems are oversized drains; therefore, the velocity of the flow will be low, thereby reducing normally available scouring action.

**Referenced Standards:**
2018 IPC, Chapter 2; Definitions:
Combination Waste and Vent System. A specially designed system of waste piping embodying the horizontal wet venting of one or more sinks, lavatories, drinking fountains or floor drains by means of a common waste and vent pipe adequately sized to provide free movement of air above the flow line of the drain.

2018 IRC, Chapter 26; General Plumbing Requirements:
P2601.1 Scope. The provisions of this chapter shall govern the installation of plumbing not specifically covered in other chapters applicable to plumbing systems. The installation of plumbing, appliances, equipment and systems not addressed by this code shall comply with the applicable provisions of the International Plumbing Code.

Therefore, since the 2018 IRC does not have a chapter which addresses plumbing definitions, we shall comply with the applicable provisions of the International Plumbing Code.

**Note:** List any new referenced standards that are proposed to be referenced in the code.

**Impact:**
A combination waste and vent system utilizes the basic principle of oversized drains with ample space for air flow above the waste flow. Because of the low-flow velocities and volumes that occur in these systems, any solids introduced would accumulate, causing blockages and reduction of the cross-sectional area of the piping. Ground food waste might collect in the drain, causing blockages. This would thereby reduce the air flow above the waste flow and defeat the intended purpose, definition and effect of the combination waste and vent system. It is our belief that there should not be any solids introduced into this system whatsoever.

There would be no effect on the cost of construction or design because the discharge of solids into a combination waste and vent system has never been allowed. Therefore, current practices used would continue.

This would be in line with the IPC, which also does not allow the discharge of solids into a combination waste and vent system for the same above listed reasoning.

**Note:** Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of construction: ☐ Increase ☐ Reduce ☒ No Effect
- The effect of the proposal on the cost of design: ☐ Increase ☐ Reduce ☒ No Effect
- Is the proposal more or less restrictive than the I-codes: ☐ More ☐ Less ☒ Same

**Departmental Impact:** (To be filled out by CPD staff)

**Note:** CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of review: ☐ Increase ☐ Reduce ☐ No Effect
- The effect of the proposal on the cost of enforcement/inspection: ☐ Increase ☐ Reduce ☐ No Effect