



STATE OF LOUISIANA
DEPARTMENT OF HEALTH AND HOSPITALS



Kathleen Babineaux Blanco
GOVERNOR

June 8, 2007

Frederick P. Cerise, M.D., M.P.H.
SECRETARY

Tina Massel
Market Manager, Commercial Water Distribution
Corzan® Piping Systems
Noveon, Inc.
9911 Brecksville Road
Cleveland, Ohio 44141-3247

Re: Corzan® ChemDrain CPVC Corrosive Waste
Drainage System consisting of pipe, fittings, and
special CPVC solvent cement

Dear Ms. Massel:

Receipt is acknowledged of your request letter dated April 20, 2007 along with a transmittal letter from Mr. Sol Zittler and a submittal package which were both hand-delivered April 23, 2007 by Mr. Sol Zittler and Mr. Bryan Hutton to the attention of Mr. Jake Causey, P.E., relative to requesting approval of the above referenced plumbing product for use in the State of Louisiana.

Your letter requests that the Corzan® ChemDrain CPVC Corrosive Waste Drainage System consisting of pipe, fittings, and special CPVC solvent cement be approved under Section 102.7 "Alternate Materials and Methods of Construction" of the Louisiana State Plumbing Code, 2000 Edition (LSPC). This Section allows the use of any material or method of construction not specifically prescribed under the LSPC provided that any such alternate has been approved by the Plumbing Official. Section 202 of the LSPC defines the Plumbing Official as: I.) the State Health Officer (= co-State Plumbing Official), and ii.) any local Plumbing Department (= co-Local Plumbing Official) established and authorized by a political subdivision of the state. After our discussions and review of the literature, etc., provided, please be advised that this office offers no objection to the use of the Corzan® ChemDrain CPVC Corrosive Waste Drainage System in Louisiana as long as the following stipulations are met:

- 1.) All installations shall be done under the direction of a Louisiana Registered Professional Engineer. It is the engineer's responsibility to ensure that the corrosive waste plumbing system to be installed will have sufficient chemical resistance to the particular corrosive wastes to which the plumbing material is expected to be exposed so that the plumbing system will not be inordinately damaged by such exposure. It is recommended that the design engineer make an evaluation of same using *ChemDrain™ Technical Information & Installation Guide* updated December 2006 (or more current updates thereof). It is noted that such document contains Chemical Resistance Information (with caution areas for

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CPVC) as well as Chemical Resistance Tables. The Chemical Resistance Tables' recommendations apply only to non-pressure, laboratory drainage applications, which are those characterized as the routine disposal of a wide variety of hot and cold chemicals in relatively small quantities accompanied by water for the purpose of dilution and flushing. This table should NOT be used for ChemDrain CPVC products in continuous or dedicated commercial or industrial chemical waste drainage systems. The ChemDrain CPVC products may be suitable for such applications; however, Corzan recommends consulting chemical resistance data for CPVC pressure piping to determine suitability for such applications.

2.) Pursuant to Section 303.5 of the LSPC, in the absence of installation procedures contained in a standard under which the materials are accepted and approved, it is required that the manufacturer's published procedures or recommendations shall be followed. Again, installation procedures and recommendations from the manufacturer are contained in *ChemDrain™ Technical Information & Installation Guide* which is referenced under item #1 above. Such installation procedures and recommendations shall be followed.

3.) All solvent cemented joints shall be done using CPVC solvent cement meeting ASTM F-493 and NSF 14 as required; however, it is special in that it has a mustard yellow color. The mustard yellow color of the solvent cement offers contrast to the to the pipe to assist in assuring that a proper joint has been made.

4.) Piping, fittings, and solvent cement shall be marked and identified in accord with Section 7 "Markings and Identification" of IGC 210 - 2005a [International Association of Plumbing and Mechanical Official's (IAPMO's) Interim Guide Criteria for CPVC Pipe and Fittings for Limited Chemical Waste Drainage Systems].

This letter of no objection does not relieve the owner, contractor, or installer from compliance with the applicable requirements of Sections 703.6 (Acid Soil and Waste Piping) and 801.4 (Neutralizing Device) of the LSPC.

Please be advised that this action does not abrogate your responsibility to obtain similar approval from those local jurisdictions having its own local Plumbing Department (= co-Local Plumbing Official) since the local jurisdiction's requirements may be stricter than the requirements of the LSPC.

Please note that the decision of whether or not your ChemDrain CPVC pipe and fittings is allowed to be used in an air plenum falls under the jurisdiction of the State Fire Marshal. If seeking approval to use this product in a plenum, please seek such approval directly from the

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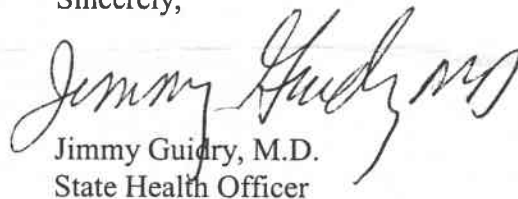
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State Fire Marshal who is housed under the Louisiana Department of Public Safety and Corrections. The SFM's architectural/engineering office may be contacted at (225) 925-4920 or 1-800-256-5452.

Should you have any questions, please do not hesitate to contact my staff at (225) 342-7504.

Sincerely,



Jimmy Guidry, M.D.
State Health Officer

JKC/jkc

cc: Sol Zittler, 3710 Lonnie Wood Dr., Houston, TX 77059
Karen Irion, Chief Engineer, OPH
Sidney Becnel, Center for Environmental Health Services, OPH
Jake Causey, Engineer, Engineering Services Section, Capitol Region II Office, OPH
District/Regional Engineers, Engineering Services Section, OPH
Rene' Chedraui, Director, Engineering & Consulting Services, LDHH
Janet McPherson, Executive Director, State Plumbing Board of Louisiana
Henry Fry, Acting State Fire Marshal, Office of the State Fire Marshal, Department of Public Safety and Corrections
Curt McCarty, Building Codes Administrator, Louisiana State Uniform Construction Code Council, c/o Office of Management and Finance, Department of Public Safety and Corrections
Charles G. Marceaux, Executive Director, State Licensing Board for Contractors
Local Plumbing Inspectors in LA (from S. Becnel's Excel list)