

STATE BUILDING CODE INTERPRETATION NO. I-38-00

June 13, 2000

The following is offered in response to your letter in which you request a formal interpretation of Section 608.16.4 of the 1997 International Plumbing Code (IPC) portion of the 1999 State Building Code. Your concern is that the requirements of Section 608.16.4.1 of the referenced code are more restrictive than the recent revisions to the Connecticut Public Health Code pursuant to Section 19a-37a, of the Connecticut General Statutes (CGS).

Section 608.16.4.1 of the 1997 IPC requires that the potable water supply be protected against backflow by a reduced pressure principal backflow preventer (RPD) whenever sprinkler systems contain chemicals or where such systems are connected to a nonpotable secondary water supply, such as a Siamese connection. The reason for the RPD requirement when a Siamese connection is utilized is the impossibility of guaranteeing that water introduced into the system through the Siamese connection is potable. Section 19a-37a, CGS, requires the Commissioner of Public Health to adopt regulations that require an RPD only when the sprinkler system contains chemicals, but specifically states that a double check valve assembly (DCVA) may be utilized when a Siamese connection is installed but the sprinkler system contains no chemicals.

The language of the IPC is clearly more stringent than that of the Public Health Department regulations. Since the designer of a sprinkler system is required to comply with both the Public Health Department Regulations and the State Building Code, the more stringent of the two regulations must be followed, resulting in compliance with the less stringent. In this case, Section 19a-37a, CGS, allows the use of an RPD in place of a DCVA on fire sprinkler systems with a Siamese connection, so no conflict between the two regulations exists.