



Plumbing Code Determination

MEMORANDUM

To: All Contractors

From: Gene F. Delauro, Assistant Director – Building Division *GFD*
Development Services Department

Date: May 28, 2019

Subject: Shower Pan Liner Inspection and Testing Requirements

Background:

An alternative method of compliance certification form was used as a tool to reduce potential damage incurred to previously approved shower pan liners during the second half of the construction process. The rationale to defer the test until later in the construction process was based on reducing the time the shower pan liner was exposed, thereby reducing potential damage and leaks. General Contractors and / or Plumbers had the option to test the shower pan liner at the plumbing top out inspection, inspected and witnessed by a City Inspector or could provide the shower pan liner certification form.

Findings:

Technical materials and photographs of shower pan liner failures were presented to the City's Mechanical Plumbing Advisory Board on August 16, 2018, November 15, 2018 and February 21, 2019 by citizens who alleged the faulty construction practices. Although no formal recommendation was issued by the Board, evidence exists to conclude some shower pan liners were not installed and tested as required by the City's adopted plumbing code.

Effective July 1, 2019, the certification form will no longer be accepted as evidence of compliance with the City's plumbing code. The previous procedure requiring a City Plumbing Inspector to inspect and witness the required test for shower pan liners during the plumbing top out inspection is required. As an alternate, a "shower pan inspection" option will be added to all plumbing permits and can be scheduled independently prior to the final plumbing inspection.