



State of Louisiana
Department of Health and Hospitals
Office of the Secretary

October 31, 2011

Glenn T. Cambre, Director
Center for Environmental Health Services
Office of Public Health
Department of Health and Hospitals
628 N. 4th Street
P.O. Box 4489
Baton Rouge, Louisiana 70821-4489

Re: **Letter of Intent – Adoption of ASSE Standard #1072-2007 – Performance Requirements for Barrier Type Floor Drain Trap Seal Protection Devices**

Dear Mr. Cambre:

It has recently come to my attention that the American Society of Sanitary Engineering (ASSE) has developed a standard which introduces an alternative method of protecting floor drain water trap seals to what is currently prescribed in Part XIV (LA State Plumbing Code, 2000 edition) of the Louisiana State Sanitary Code (LAC 51). This standard titled ASSE 1072-2007 – Performance Requirements for Barrier Type Floor Drain Trap Seal Protection Devices, establishes physical requirements, performance requirements, and test procedures for barrier type floor drain trap seal protection devices.

I have been made aware that these barrier-type devices are designed to minimize evaporation from the fixture side of water trap seals of floor drains to assist in maintaining the water seal of the trap which prevents sewer gas from entering the occupied portion of the premises. A review of the standard has revealed that ASSE 1072 approved devices must undergo a series of performance examinations including dirt and debris, evaporation, trap seal interference, opening, flow, floor wax, grease, and life cycle tests. It is my understanding, based upon your staff's research and recommendations, that devices complying with this standard can provide an additional method for protecting floor drain water trap seals. Therefore, it is my intent to adopt ASSE Standard #1072-2007 with the following stipulations:

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1. The content of the existing Section 409.4.1.4 of the Louisiana State Plumbing Code, 2000 edition (LSPC) shall be amended and proposed for adoption in a future edition of the plumbing code as follows:

“Floor drain trap seals shall be regularly and automatically fed (water seal replenished) by the addition of water, liquid waste, or industrial waste (such as the normal and regular operation of a plumbing fixture or condensate waste draining thereto) into the floor drain or, in lieu thereof, shall be protected by the use of:

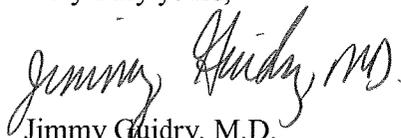
- i. an ASSE 1018 automatic trap priming device (see 614.4) and approved for that application;
 - ii. a gravity type automatic trap priming device which captures liquid wastes from the tail piece of a lavatory or from the discharge side of the atmospheric vacuum breaker located downstream of a flushometer valve servicing a water closet or a clinical sink (the take off point on the discharge pipe must be at least 4” below the critical level of the vacuum breaker);
 - iii. an ASSE 1072 listed barrier type floor drain trap seal protection device; or,
 - iv. a deep-seal type of trap having not less than a 4-inch (102mm) water seal.”
2. Per the requirements of the existing LSPC 409.4.1.1, all floor drains installed in public toilet rooms shall continue to be equipped with a trap primer meeting ASSE 1018 or a gravity type automatic trap priming device to maintain the water seal in the floor drain trap. (However, should one so desire, nothing herein shall be interpreted to prohibit the use of an ASSE 1072 device and/or a deep-seal type of trap in addition to the use of an ASSE 1018 or gravity type automatic trap priming device.)
 3. The installation of barrier type floor drain trap seal protection devices shall be performed in accordance with ASSE 1072-2007 and the manufacturer’s installation instructions. In instances where there are conflicts between the requirements, the more stringent provisions shall prevail.
 4. Nothing contained herein shall be construed to eliminate the requirement that each plumbing fixture be provided with a properly installed fixture trap which is properly vented.
 5. Manufacturers and vendors of floor drain trap seal protection devices must ensure that their advertisements and product literature do not falsely indicate that such devices may be used in lieu of an approved trap priming device or as a retrofit in those instances where a trap primer or a gravity type automatic trap priming device is explicitly required (*e.g.* in public bathrooms). The DHH Office of Public Health will refer any known instances of such false statements or advertising to the Louisiana Attorney General’s Consumer Protection Section.

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Type Floor Drain Trap Seal Protection Devices

Please note that the undersigned is the co-state “Plumbing Official,” as that term is defined in the LSPC, and that the decision contained within this letter does not abdicate the user’s or installer’s responsibility to obtain approval from the co-local “Plumbing Official”, *i.e.*, the parish, city or other local governmental plumbing jurisdiction.

Please ensure that copies of this letter are circulated to your staff and others as appropriate. Should questions arise, they should be directed to Mr. Jake Causey, P.E., Chief Engineer, Engineering Services Section, Center for Environmental Health Services, Office of Public Health. Mr. Causey may be reached at (225) 342-7499.

Very truly yours,


Jimmy Guidry, M.D.
State Health Officer

JG//JKC/JKH/jkh

cc: Jake Causey, Chief Engineer, Engineering Services Section, CEHS, OPH
Jeremy Harris, Engineer, Engineering Services Section, CEHS, OPH
District/Regional Engineers, Engineering Services Section, CEHS, OPH
Tenney Sibley, Chief Sanitarian, Sanitarian Services Section, CEHS, OPH
Sidney Becnel, Legislative Liaison & Rulemaking Manager, CEHS, OPH
State Plumbing Board of Louisiana c/o John Barker, Executive Director
State Licensing Board for Contractors c/o Michael McDuff, Executive Director
H. “Butch” Browning, Jr., State Fire Marshal, Office of the State Fire Marshal, Department
of Public Safety and Corrections
Joe DeLaune, Architect, Chief Building Official, Building Official Plan Review Division, Office of the
State Fire Marshal, Department of Public Safety and Corrections
Louisiana State Uniform Construction Code Council c/o Denise C. Jobe, Administrator, c/o Office of
Management and Finance, Department of Public Safety and Corrections
Louisiana Professional Engineering and Land Surveying Board c/o Donna D. Sentell, Executive Secretary
Louisiana Engineering Society c/o Brenda Gajan, Executive Director
Louisiana Board of Architectural Examiners c/o Mary “Teeny” Simmons, Executive Director
AIA Louisiana c/o Lynn B. Robertson, Executive Director
American Society of Plumbing Engineers, New Orleans Chapter, c/o Richard Molina
Local Plumbing Inspectors (from S. Becnel’s Excel list)