



## MEMORANDUM

**TO:** Regina Hanshaw, Executive Secretary, Ohio Board of Building Standards

**FROM:** Mark Hamlin, Director of Regulatory Policy

**DATE:** January 9, 2014

**RE:** **CSI Review – Ohio Plumbing Code (OAC 4101:3-2-01, 4101:3-3-01, 4101:3-4-01, 4101:3-6-01, 4101:3-10-01, and 4101:3-13-01)**

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On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

### Analysis

This rule package consists of six rules being proposed by the Ohio Board of Building Standards dealing with the Ohio Building Code. Each rule is being proposed with amendments such as exceptions to shower liner test requirements, lead content standards, and references to trap seal protection devices. The changes to lead content standards are intended to comply with recent changes to the federal Safe Drinking Water Act.

The BIA submitted by the Board describes its outreach to stakeholders, additional details about the proposed changes, and the reason for the proposals. Due to the specific nature of the amendments proposed in the package, the Board does not anticipate significant new compliance costs as a result of the changes. One comment was submitted during the CSI review process, expressing support for the proposed rules. The CSI Office finds that the purpose of the proposed rules justifies the adverse impacts to businesses.

### Recommendations

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

**Conclusion**

Based on the above comments, the CSI Office concludes that the Ohio Board of Building Standards should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.