

**March 10, 2008**

**TO: All Concerned**

**FROM: Jay Mundy, CIPE, CPD  
Plumbing/Mechanical Inspections Supervisor**

**SUBJECT: UPC Section 508.4**

**Section 508.4 includes language that was evidently partially extracted from a source that has no applicability to the need for a collection pan beneath a water heater. For example, referencing a floor-subfloor assembly in this Section makes no sense at all. A subfloor is typically the rough unfinished surface over which a finished floor surface is installed. A water heater would not be installed between these two surfaces. An “attic-ceiling assembly” and a floor-ceiling assembly would represent the structural components that that comprise an assembly with a top and bottom membrane with joists sandwiched in between them. This Code section correctly references an attic as being a space where a water heater might be installed, and which would require installation of a collection pan beneath the water heater, to collect water coming from a heater which is beginning to fail. Any similar installation located between the ceiling space and the floor above would require a collection pan beneath the water heater.**

**This Section does not require a pan under water heaters installed on the floor of an upper level of a multi-story building. Water heaters on upper levels of a building are normally in clear view of the occupants, and any leakage would soon become evident. Water heaters in an attic, or an unoccupied space above a ceiling are not in view, and leakage would usually remain undetected until structural damage had occurred. Leakage would likely cause structural damage if it were not being collected in a pan, with the pan then being piped to a location that would draw attention when water began flowing.**

**In summary, the intent of the Code is to prevent structural damage as a consequence of water leaks occurring at relatively concealed water heater locations such as within an “attic” or concealed space. Water heaters eventually fail, and the objective is to protect the structure below from consequent water damage.**