



# PUBLIC CODE CHANGE PROPOSAL FORM FOR PUBLIC PROPOSALS IN THE INTERNATIONAL CODES

## 2007/2008 CODE DEVELOPMENT CYCLE

CLOSING DATE: All Proposals Must Be Received by August 20, 2007

The 2007/2008 Code Development Hearings are tentatively scheduled for  
February 18 – March 2, 2008, location TBD.

1) Name: **Tom Neltner** Date: **August 15, 2007**  
 Jurisdiction/Company: **National Center for Healthy Housing**  
 Submitted on Behalf of: **National Center for Healthy Housing and Alliance for Healthy Homes**  
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 City: **Silver Spring** State: **Maryland** Zip Code: **21044**  
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2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at [www.iccsafe.org](http://www.iccsafe.org). If you have previously executed the copyright release, please check the box below:

**2007/2008 Cycle copyright release on file Mailed separately.**

3) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym: **IPMC**  
 If you have also submitted a separate coordination change to another I-Code, please indicate the code: **N/A**  
 (See section below for list of names and acronyms for the International Codes).

4) **Be sure to format your proposal and include all information as indicated on Page 2 of this form.**

5) Proposals should be sent to the following offices via regular mail or email. An e-mail submittal is preferred, including an electronic version, in either Wordperfect or Word. The only formatting that is needed is **BOLDING, STRIKEOUT AND UNDERLINING**. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by ICC. **REMOVE TRACKING CHANGES, AUTOMATIC NUMBERING, OR ANY OTHER ADVANCED FORMATTING TOOLS THAT ARE PROVIDED BY WORD, FROM FILES CONTAINING YOUR CODE CHANGE PROPOSAL THAT YOU SEND TO ICC.**

Please use a separate form for each proposal submitted. Note: All code changes received will receive an acknowledgment.

Please check here if separate graphic file provided.

Graphic materials (Graphs, maps, drawings, charts, photographs, etc.) must be submitted as separate electronic files in .CDR,.IA,.TIF or .JPG format (300 DPI Minimum resolution; 600 DPI or more preferred) even though they may also be embedded in your Word or Wordperfect submittal.

### Code

IBC - International Building Code  
 IEBC - International Existing Building Code  
 IFC - International Fire Code  
 IFGC - International Fuel Gas Code  
 IPC - International Plumbing Code  
 IPSDC - International Private Sewage Disposal Code  
 IPMC - International Property Maintenance Code  
 IWUIC - International Wildland-Urban Interface Code  
 IZC - International Zoning Code  
 ELECT - International Code Council Electrical Code– Administrative Provisions

### Send to:

International Code Council  
 Chicago District Office  
 Attn: Diane Schoonover  
 4051 West Flossmoor Road  
 Country Club Hills, IL 60478-5795  
 Fax: 708/799-0320  
[codechanges@iccsafe.org](mailto:codechanges@iccsafe.org)

IECC - International Energy Conservation Code  
 ICC PC - ICC Performance Code  
 IMC - International Mechanical Code  
 IRC - International Residential Code

International Code Council  
 Birmingham District Office  
 Attn: Annette Sundberg  
 900 Montclair Road  
 Birmingham, AL 35213-1206  
 Fax: 205/592-7001  
[codechangesbhm@iccsafe.org](mailto:codechangesbhm@iccsafe.org)

## CODE CHANGE PROPOSAL

**Code Sections/Tables/Figures Proposed for Revision (3.3.2):** Section 202

**Name/Company/Representing (3.3.1):**

Tom Neltner, National Center for Healthy Housing and Alliance for Healthy Housing

**Proposal:** NOTE: PLEASE READ ITEM 5) of the first page of this form for formatting instructions.

Revise as follows:

EXTERMINATION. The control and elimination of insects, rodents or other pests by eliminating their harborage places; by removing or making inaccessible materials that serve as their food or water; by trapping; and, when necessary, by use of registered pesticides consistent with label instructions in a manner that effectively controls the pest with the lowest exposure to occupants. ~~by poison spraying, fumigating, trapping or by any other approved pest elimination methods.~~

**Supporting Information (3.3.4 & 3.4):**

The current language has several shortcomings:

1. It does not address the need to restrict pests' access to water. Pests such as cockroaches and mice rely on regular sources of moisture to survive. Because many pests eat standard building materials, controlling food without controlling water is not effective extermination.
2. The term "poison spraying" is too narrow: some effective pesticides are not poisons. Pesticide is the more common and appropriate term.
3. In the United States and in most countries, pesticides must be registered by the federal government and used in a manner consistent with the label instructions.
4. The specification of spraying and fumigating suggests that those methods are preferred over other methods and may be interpreted as a requirement. However, current research indicates that many pests are more effectively controlled by baits containing pesticides or insect growth regulators. Spraying and fumigating are not particularly effective methods for controlling rodents and cockroaches, and exposure to pesticides through spraying and fumigation endangers human health. See Comparison of Costs and Effectiveness for Cockroach Control Case Study at [http://www.healthyhomestraining.org/ipm/Case\\_Study\\_Costs.pdf](http://www.healthyhomestraining.org/ipm/Case_Study_Costs.pdf) to compare the latest research.

The proposed language addresses these shortcomings by adding water to the list of materials that should be inaccessible; by using updated terms; by requiring compliance with the label instructions; and by setting performance standards for the selection of the pesticide. The pesticide needs to effectively control the pest and reduce exposure to occupants. Exposure is a reasonable surrogate for risk to occupants and is more easily assessed by a code inspector.

**Referenced Standards (3.4 & 3.6):**

None

**Cost Impact (3.3.4.6):**

The proposal will not increase the cost of construction or the cost of maintaining and operating existing buildings. If implemented, it should reduce the costs of maintaining and operating existing buildings.