

# **American Brass & Aluminum Foundry Inc.**

2060 Garfield Ave-City of Commerce, CA 90040 Phone 1-800-545-9988 Fax 1-800-835-7020

September 12, 2008

To Whom It May Concern:

As requested I'm writing this letter regarding the function of the overflow. As I understand it the overflow was originally created because home owners wanted a way to drain their bathtub without having to stick their hand in the water. Manufacturers came up with the trip lever. This trip lever required a hole to be drilled in the bathtub; however, the mechanical part of the trip lever would allow water to escape behind the tub so they made it attach to the waste system. Some water could pass behind the cover plate that held the trip lever in place causing many to refer to the hole as an overflow. Over a period of decades this tem became a non technical or perhaps colloquial term for a trip lever hole.

However, no definitions exist within the plumbing code bodies, standards writing bodies, or the testing labs to define what a tub overflow is or what it is supposed to accomplish. Our IAPMO product listing states that we are in compliance with the ASME A112.18.2-2005/CSAB125.2-05 Standard. If you read this standard you will find that the definitions section does not define the word overflow. The only place where the word overflow appears in the text of the document is section 5.8.2 where is states that a minimum flow rate test is not applicable to the overflow. This means there is no information available from the plumbing industry as to how a tub trip lever hole might perform as an overflow. Therefore we can not guarantee the performance of a trip lever hole acting as an overflow.

If you have any questions or would like to speak to me personally please feel free to call me at 253-732-7277.

Sincerely,

Todd Ricco  
National Sales Manager  
American Brass & Aluminum Foundry Inc.