

ACEC

AMERICAN COUNCIL OF ENGINEERING COMPANIES
of Minnesota

February 25, 2013

RECEIVED

FEB 28 2013

DEPT. OF LABOR & INDUSTRY
LEGAL SERVICES

**2012-2013
Board of Directors**

Gene M. Sieve, President
*Burns & McDonnell Engineers-
Consultants*

Avo Toghradjian, President-Elect
Isthmus Engineering

John W. Dillingham, Vice President
Alliant Engineering, Inc.

Pat M. McGraw, Treasurer
Stantec

Daniel E. Murphy, Secretary
Meyer Borgman Johnson

Robert J. Struve, Past President
American Engineering Testing, Inc.

Jeffrey W. Coleman
The Coleman Law Firm, LLC

William E. Deitner
TKDA

Fred W. King
INSPEC

Tim E. Korby
Donohue & Associates, Inc.

Tim H. Lamkin, Jr.
HR Green, Inc.

Craig R. Lenning
HDR

Thomas O. Parker
Jacobs Engineering Group, Inc.

Susan P. Rani
Rani Engineering, Inc.

Matthew P. Ruble
Braun Intertec

David E. Oxley, Executive Director

Kelli Peters
MN Plumbing Board
c/o Department of Labor and Industry
433 Lafayette Road North
St. Paul, MN 55155

Dear Ms. Peters:

The American Council of Engineering Companies of Minnesota (ACEC/MN) (www.acecmm.org), formed in 1949, is a statewide organization dedicated to enhancing the consulting engineering profession, promoting the private enterprise system and protecting the general public. ACEC/MN's 150 member firms, representing over 4,500 employees, provide services to all segments of society, including federal, state and local governments, private industry and the general public.

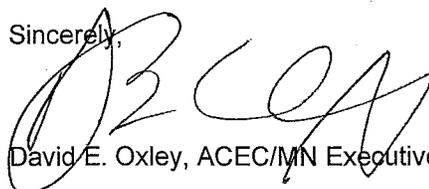
One of the many services our members provide is the design of mechanical systems for buildings, which includes the plumbing systems. Our members welcome the adoption of a model plumbing code to replace the current Minnesota Plumbing Code. Using a model plumbing code provides more uniformity in how those systems are designed, makes it easier to work in other states that use a model plumbing code, and will result in an easier process to update the code in the future. We realize that amendments to the model plumbing code would still be required for our state, as is the case with all of the other model codes our state uses for construction projects.

There are two model plumbing codes to consider. One is the Uniform Plumbing Code (UPC), and the other is the International Plumbing Code (IPC). The UPC is a more prescriptive based design code, and the IPC is a more performance based design code. The end result of using either code is essentially the same.

Minnesota has adopted, with amendments, the International Building Code (IBC), the International Mechanical Code (IMC), the International Fuel Gas Code (IFGC), and the International Fire Code (IFC). Work is now being performed to adopt the International Energy Conservation Code (IECC) as the State's energy code. Adopting the International Plumbing Code (IPC) would be a natural fit toward coordinated construction codes. The IPC has already been adopted in 34 states, as well as Washington, DC, New York City, Guam, Puerto Rico, and the US Virgin Islands. It is also used as a code basis for the Department of Defense and other federal agencies, as well as several foreign countries.

We as an organization encourage the State of Minnesota Department of Labor and Industry to adopt the International Plumbing Code as the state plumbing code. Doing so will provide uniformity in plumbing design, provide more consistency in how the individual building codes work together, and make it easier for our members to perform plumbing design out of state. We see no compelling reasons to adopt the Uniform Plumbing Code.

Sincerely,



David E. Oxley, ACEC/MN Executive Director

Peters, Kelli (DLI)

From: Greg Johnson <gjohnsonconsulting@gmail.com>
Sent: Friday, March 01, 2013 10:04 AM
To: DLIRULES (DLI); Peters, Kelli (DLI)
Cc: 'Richard Hauffe'
Subject: Comments on Possible Amendment to Rules Governing the MN Plumbing Code
Attachments: AMBO White Paper MN Model Plumbing Code Adoption 4-15-11.pdf; Comments on Possible Amendment to Rules Governing the MN Plumbing Code 2-28-13 GJ.pdf

Hi Ms. Peters,

Would you acknowledge receipt, please?

I want to make sure that I don't miss the comment deadline.

Thanks,

Greg

651-235-1215

February 28, 2013

MN Plumbing Board
Chair John Parizek
Department of Labor & Industry
443 Lafayette Road North, St Paul 55155

Via e-mail to: dli.rules@state.mn.us and Kelli Peters, DLJ staff

Comments on Possible Amendment to Rules Governing the MN Plumbing Code, MR Chapter 4715; Revisor's ID Number R-4139

Thank you for allowing me the opportunity to comment on the proposed adoption of the Uniform Plumbing Code. I offer the following comments on my own behalf as a private citizen with some knowledge of the subject matter. In the spirit of Edmund Burke, I feel obliged to comment as a matter of civic responsibility.

On adoption of the Uniform Plumbing Code:

Adoption of the Uniform Plumbing Code (UPC), promulgated by the International Association of Plumbing and Mechanical Officials (IAPMO), versus adoption of the alternate model plumbing code, the International Plumbing Code (IPC), promulgated by the International Code Council (ICC), would be a colossal failure of public policy on virtually every of level.

That the selection of one of the model plumbing codes is a policy decision versus a technical decision is proven by the safe use of each code in many other locations. Both effectively protect the physical health of the public.

There is a readily apparent perspective by many members in the installation segment of the plumbing industry, including members of the plumbing board, that a primary purpose of the plumbing code is to benefit the plumbing industry and that this should be determinative of what plumbing code should be adopted. As evidence I would offer the statement of former plumbing board member Jim Gander at the April 2011 plumbing board meeting who, when making the motion to adopt the UPC, said that he preferred the UPC because it was written by plumbers and that "*plumbers should control their own destiny.*" Also evidentiary is that the only organizations which have supported a UPC adoption are associations representing the installation segment of the industry. Each of these associations indicated preference for the UPC because it was

written by the plumbing industry. This philosophy suggests government by the plumbers and for the plumbers rather than by the people and for the people.

It is telling that the only interests supporting UPC adoption are those who sell plumbing installations. Neither plumbing code erects barriers to the successful business of plumbing. Neither plumbing code makes contractors more or less competitive in their respective markets. Either plumbing code will provide a level playing field for industry competition. The international codes are the most widely plumbing provisions in the world. It is self-evident that the plumbing industry exists and thrives in those locations. The technical capacity of either code to support the economic health of the industry is proven.

The vehement support by the sellers of plumbing installations for the UPC is driven by a certainty that the UPC provides *superior* economic benefits for the plumbing industry. The UPC accomplishes this goal by selling more plumbing than the minimum standard of the public need.

It is simply not true that the purpose of the plumbing code is to benefit the plumbing industry. The purpose of the plumbing code is to provide a minimum standard to protect the public's health, safety, and welfare. Allowing the welfare of the plumbing industry to be determinative in selecting a model plumbing code for adoption, versus the welfare of the public, is a failure of government.

Policy comparison of UPC versus IPC adoption:

Effectiveness: Both the UPC and IPC are used without negative health consequences in many locations in the USA. There is no policy advantage to either with regard to the documents' effectiveness in protecting the public's health.

Ease of use: The IPC is offered with a commentary that explains in detail every section of the document. The UPC has no comparable document. **Policy advantage: IPC.**

Performance language: Supporters of the UPC tout it as written in more prescriptive language than the more performance oriented language of the IPC. In this respect the UPC conflicts with state regulatory policy as identified in MN Statute 14.002 which states, with respect to overly prescriptive and inflexible rules, that "*whenever feasible, state agencies must develop rules and regulatory programs that emphasize superior achievement in meeting the agency's regulatory objectives and maximum flexibility for the regulated party and the agency in meeting those goals.*" Further, relative to state building code adoption and the general powers of the Commissioner of Labor and Industry, MS 326B.106 further states that "*To the extent possible, the code must be adopted in terms of desired results instead of the means of achieving those results,*

avoiding wherever possible the incorporation of specifications of particular methods or materials." Also, the policy and purpose of the state building code as identified in MS 326B.101, states in part (emphasis added), "The State Building Code governs the construction, reconstruction, alteration, and repair of buildings and other structures to which the code is applicable. The commissioner shall administer and amend a state code of building construction which will provide basic and uniform performance standards..." While the responsibility for the adoption of the state plumbing code is given to the state plumbing board, the state plumbing code remains a chapter of the state building code. There is no statutory language that suggests the state plumbing board is encouraged to ignore state regulatory policy by selecting the less performance oriented model plumbing code, the UPC, for adoption. **Policy advantage: IPC.**

Design Flexibility: Because the UPC is more prescriptively written it tends to stifle innovation. Additional performance options offered by the IPC give designers more flexibility which leads to cost effectiveness. **Policy advantage: IPC.**

Affordability: The IPC offers many more methods of venting; requires fewer fixtures for most uses; and requires smaller pipe sizes. These drive down installation costs. **Policy advantage: IPC.**

Innovation: The IPC consistently permits new labor and cost saving methods and materials before the UPC, sometimes by a code cycle, or three years, sometimes by many more years. The following is a history of acceptance of new technology in model plumbing codes (Note that BOCA, CABO, & SBCCI are legacy organizations of the ICC).

- **PVC – Drain, Waste, and Vent**
 - SBCCI 1968 DWV
 - UPC 1973 DWV 5 year lag
- **CPVC**
 - BOCA 1975
 - SBCCI 1977
 - UPC 1981 6 year lag

- PEX
 - CABO 1992
 - BOCA 1993
 - SBCCI 1994
 - IPC 1995
 - UPC 2000
- Air Admittance Valves
 - IPC 1997
 - UPC 2009 Appendix (tentative)
- 8 year lag

November 2011, a manufacturer lost an appeal to have AAVs incorporated into the 2012 UPC. Since no change is possible before the 2015 UPC, the lag is 18 years and counting. While MN has the only statutory prohibition on AAV's in the country, the lag in UPC adoption of AAVs still indicates the UPC's resistance to modern methods and materials.

- Horizontal Wet Venting
 - International Plumbing Code 1994
 - Uniform Plumbing Code 2009 15 year lag
- NonWater Supply Urinals
 - International Plumbing Code 2006
 - Uniform Plumbing Code 2009 3 year lag
- (Requires water supply)
- Fuel Gas Provisions NFPA 54 (Water Heaters)
 - International Fuel Gas Code 1997
 - Uniform Plumbing Code 2003 6 year lag
- Flood Hazard Requirements
 - International Plumbing Code 2003
 - Uniform Plumbing Code 2006 3 year lag
- Ductile Iron Water Pipe
 - International Plumbing Code 2003
 - Uniform Plumbing Code 2006 3 year lag

Given the history of delay by the UPC to allow modern and more efficient plumbing materials and methods, an adoption of the UPC would conflict with the policy and purpose of the state building code as identified in MS 326B.101, which states, *"The State Building Code governs the construction, reconstruction, alteration, and repair of buildings and other structures to which the code is applicable. The commissioner shall administer and amend a state code of building construction which will provide basic and uniform performance standards, establish reasonable safeguards for health, safety, welfare, comfort, and security of the residents of this state and provide for the use of modern methods, devices, materials, and techniques which will in part tend to lower construction costs. The construction of buildings should be permitted at the least possible cost consistent with recognized standards of health and safety."* The UPC demonstrably does not *"provide for the use of modern methods, devices, materials, and techniques which will in part tend to lower construction costs."* **Policy advantage IPC.**

Coordination with other codes: The IPC is coordinated at the national level of development with the building, existing building, fire, mechanical, and residential codes adopted by MN, eliminating conflicting code requirements. **Policy advantage IPC.**

Green Building and Sustainability: The IPC does not confuse irrigation and outdoor water installations with plumbing. Plumbing is historically about indoor potable water supply and sanitary waste water disposal (excepting indoor roof stormwater leaders and conductors). Irrigation requires different technical skills and knowledge than plumbing as does rainwater catchment. Expanding the definition of plumbing to those outdoor water installations posits a radical change in installer licensing requirements. The water efficiency provisions of the International Green Construction Code were developed, in part, with the US Green Building Council to address outdoor water uses and do not confuse plumbing with outdoor water installations. The IPC uses less material to obtain the same results. The IPC does not require that non-water urinals be provided with a water supply 'just in case' as does the UPC. **Policy advantage IPC.**

Workforce development/small business opportunity: All of the International Codes are published in both English and Spanish. Spanish translations of the IPC greatly facilitate training and workforce development by eliminating barriers and integrating a rapidly growing demographic into the skilled labor workforce which in turn fosters small business creation and increases economic competitiveness. **Policy advantage IPC.**

International trade: Spanish versions of the International codes facilitate international trade. **Policy advantage IPC.**

Local government impact: Local MN officials already participate in the International code development at the national level making participation in plumbing code development easier and cheaper since it doesn't involve additional trips to alternate locations. The ICC is controlled by state and local government representatives and MN local governments have longstanding relationships, both political and economic, with an excellent ability to influence the ICC. Local government already uses the ICC for training, certification, products, and services. The coordination of the ICC codes makes local government administration more efficient and effective. Many MN inspectors have certifications in MN code designed to update/transfer to IPC. **Policy advantage IPC.**

Although previously provided, I would ask that the plumbing board carefully review the also attached Association of MN Building Officials' White Paper on Model Plumbing Code Adoption. I believe it expands on a number of my points as well as addresses other topics such as licensing reciprocity. I believe it further documents the fact that there is no public benefit to adopting the UPC and multiple public benefits to adopting the IPC.

While I recognize that a majority of the plumbing board is employed in, and statutorily required to have technical licensures in plumbing installations; and that the nature of the decision before the board is that of policy versus technical code content; I have some hope that the plumbing board will fulfill its obligation as a state agency to act for the public benefit, rather than for that of the industry, by rejecting the Uniform Plumbing Code and adopting the International Plumbing Code.

Thank you for considering my comments. I appreciate the opportunity to contribute and will serve as a resource in whatever way that I may.

Sincerely,

Greg Johnson

gjohnsonconsulting@gmail.com

651.235.1215

The Association of Minnesota Building Officials

*Committed to serving the public interest and
the professionals that ensure safety in the built environment*

White Paper on Model Plumbing Code Adoption

by the

Minnesota State Plumbing Board

April 15, 2011

As the state plumbing board evaluates and compares International and Uniform model plumbing codes for adoption in MN the decision making can be assigned to two general areas of consideration, technical provisions and policy impacts.

In the area of technical provisions the board needs to determine whether the model code works. Simply, does the code adequately protect the health of the public?

At the board's national model code review committee's second meeting Labor and Industry staff stated that both model codes worked to protect the public and that there were no reports nationally of any problems with the codes protecting the public. As it was stated in the committee meeting, "*Neither code has left a trail of dead bodies behind.*"

Further, members of the committee said the number of technical amendments required to each of the model codes to align them with MN's specific technical perspective was both comparable and minimal.

Finally, on technical provisions, deference must be given to the board's statutory authority to amend the code. Any technical requirement deemed deficient by the board can be amended, meaning that since the national models require approximately the same amount of amendments, technical considerations give neither model code an advantage for adoption purposes.

Given no technical advantage to MN of using either code, the decision to adopt a model plumbing code becomes a policy decision that can be considered in the context of the following categories of import.

Training Requirements

Regardless of which national model code is adopted in MN some additional training for designers, regulators, contractors, and installers will be necessary.

It's helpful that neither model code makes illegal any piping method or installation that is currently legal under the homegrown plumbing code, meaning that the industry won't be 'un-learning' things. It's more accurate to say that the model codes offer additional and more current nationally accepted materials and methods of piping installation. The national model code review committee recognized this in discussion when members said the MN state plumbing code was out of date.

It's also instructive to look to Jack Hettwer's testimony in the contested hearings to adopt the International Mechanical and Fuel Gas codes in 2004. Mr. Hettwer, who at the time was the training coordinator for the Joint Minneapolis Plumbers Training Committee said that most plumbing work "*is service, repair, and remodeling with no contractor on site.*" Re-stated,

methods that an installer already knows how to apply in a specific circumstance aren't changed, but additional options may be presented by the model code.

It's valid to say that training to the most current technology is an on-going expense of progress in any industry. New methods and materials trigger the need for the workforce to remain competitive through qualification. This is the kind of training that makes installers more valuable to contractors and contractors more valuable to owners. The plumbing board's concurrent initiative to require continuing education of plumbers inherently recognizes the need for the workforce to engage in on-going training. This continuing education requirement will neatly address the specifics of the additional options offered by a national model code adoption.

Referring to the earlier technical area, if either model code works and would receive approximately the same amount of amendment, each code would trigger comparable changes to training curriculum for the industry.

The construction economy slow down actually enhances the ability of the industry to respond to changing training needs as fewer apprentices are affected. For example, the Minneapolis Plumbers' Joint Journeyman and Apprentice Training website states that the program *"will not be taking applications for the apprenticeship program in March, 2011 due to the economic slowdown over the last couple of years. The list of applicants from March, 2010 will be kept open until March, 2012."* (www.training15.com/index.php)

If the plumbing board decides to adopt the IPC it's helpful that the United Association training manual includes content from the International Plumbing Code. This should keep changes to the Joint Journeyman and Apprentice Training curriculum to a necessary minimum.

The model codes offer the benefit of off-the-shelf training programs by nationally-recognized experts in the field. The International codes offer the additional advantage of being able to be bundled as training events, meaning that a designer, inspector or contractor who works in more than one discipline can attend training events that offer training in multiple disciplines, such as institutes where plumbing, mechanical, and building code requirements are taught. This advantage becomes magnified as the need for new competencies in green building and water efficiency accelerate.

An additional strength of an International plumbing code adoption is the ease of access to training. The ICC is regularly contracted in MN to give continuing education training that is qualified for building official and inspector certification renewals and the building official chapters of the ICC frequently offer affordable training opportunities.

Courses can be developed by ICC specifically for MN and for retraining inspectors to new language.

Caution should be taken by the plumbing board in relying upon offers of free training to government officials by either the ICC or IAPMO and then learning later that those officials can't accept the training without running afoul of Section 471.895 of MN Statutes or local ordinances. The League of MN Cities' Handbook for MN Cities says that, "*many cities interpret the gift law to apply to all city employees.*"

Ease of Use

Industry and local government official have enjoyed the ease of using single volumes that incorporate mechanical, fuel gas, and plumbing code provisions as published by the ICC. As MN adopts a national model plumbing code the only way to continue to publish all of these related requirements in a single volume is to adopt the International codes' plumbing provisions. Copyright issues prevent merging IPC and UPC content.

Additionally, as mentioned elsewhere, only the International codes have current commentaries which explain in detail every code requirement leaving no room for confusion over intent and compliance.

License Reciprocity with Adjoining States

Inquiries with Mn's adjoining states reveal that neither South Dakota nor Wisconsin grant reciprocity based upon the code adopted by the prospective partnering state. Rather, each looks to the quality of the reciprocal's licensing and training programs.

In Iowa plumbing is licensed at the local level. Both the IPC and UPC are adopted at the local level.

North Dakota uses the UPC but has reciprocity with MN which already has a different code, the state plumbing code, which is generally less similar to the UPC than the IPC because of its lag in recognition of modern methods and materials.

MN is the much larger market, so ND will have an incentive to maintain reciprocity to protect its contractors' ability to work in MN. The population of ND is 646,844. The population of MN is 5,266,214.

The plumbing board in ND hasn't considered reciprocity with MN if it goes to a model code. In the unlikely event that a change to the IPC by MN meant the loss of reciprocity with ND, MN plumbers will still be able to work in ND by obtaining a ND license.

To do plumbing work in North Dakota, without reciprocity, you must pass an exam to get a license. To qualify for the master exam you need two years of work experience as a licensed journeyman plumber in North Dakota or *any other state* that has a state licensing law. If you have a valid master license in another state, you can also use it to apply for a master exam.

The exam and master license costs \$200. The exam and journeyman license is \$100. Both are good for one calendar year. Note that these fees are less than MN charges just to process a Master Plumber and Journeyman Plumber Reciprocity Application with either SD or ND licensed plumbers.

It's also worth noting that nowhere on the MN Master Plumber and Journeyman Plumber Reciprocity Application is any plumbing code referenced.

In related credentialing information, the Association of MN Building Officials retained the ICC in 2005 to develop certifications in both residential and commercial plumbing inspection.

These certifications tests were developed by a committee of subject matter experts, (plumbers, plumbing contractors, and plumbing inspectors) from MN with support from ICC staff. The committee used a pool of questions that were applicable to both the International codes' plumbing provisions & the MN state plumbing code.

These certifications were designed to transition to IPC certifications if the state adopted the IPC. These certifications were also just updated. Adopting the International code plumbing provisions protects the integrity and value of the certifications.

ICC certifications are recognized across the country as demonstrating the professional qualifications of inspectors.

Economic Impact on Local Government.

In addition to co-located, multi-disciplinary training, local government benefits in the area of co-located code development if the IPC is adopted. Local MN officials are already participating in the International code development process at the national level and can far more easily participate in plumbing code development if it doesn't involve additional trips to alternate locations.

Co-located companion code hearings facilitate a jurisdiction's ability to be active in the process, benefitting the jurisdiction through input into the code and by having officials that better understand the intent of the code through their participation.

It should be noted that this benefit also applies to any DLI staff with responsibilities in multiple disciplines or general functional areas.

Mn's local governments are also well satisfied with the panoply of support services and materials that the ICC offers. Those include commentaries and technical interpretation to make sure the code is appropriately administered, manuals, checklists, guidelines, and other tools in multiple formats, and product evaluations to facilitate the introduction of technological improvements. An IPC adoption means ready access to this wealth of material without local government having to develop either their own resources or new vendor relationships.

Performance versus Prescriptive

Claims that because the IPC offers more design options it is somehow less suitable for adoption are more readily assigned to the category of political opposition than legitimate objection.

The IPC offers both prescriptive *and* performance provisions without assuming that the code needs to teach skilled installers how to plumb. That this approach is effective is evidenced by the fact that the plumbing provisions of the International codes are the most widely adopted in the US. Clearly the provisions are useable by industry and the public.

Worth mentioning is that commentaries to the International codes are available which walk the user through the intent and content of the code section by section which should satisfy the most ardent supporter of prescriptive language. The UPC has no similar commentary.

Consistency and Correlation.

The problems created by conflict between code provisions with which contractors, owners, and installers must comply cannot be overstated, particularly when more than one regulatory agency is involved.

When multiple agencies, at multiple levels of government, administer multiple codes, which is the case in health care, education, and essentially all state licensed facilities, regulated parties are put into the position of serving more than one master. Any conflict in the language of the various codes means an owner can't legally comply with requirements. Resolution is often only possible when one of the regulating agencies 'stands down'.

Standing down can be difficult for regulators because of the issues that typically drive turf battles. Even when the final interpretive authority rests with one agency, conflicts in the code mean the agency has to accept non-compliance in some regard which always leaves the agency open to criticism or worse, liability. Conflict between codes makes government look stupid.

It's critical to remember that while government tries to resolve conflict designers, contractors, owners, and installers wait for resolution. In construction scheduling is often the difference between a successful project and an economic loser. Time is money.

Codes that have been correlated at the national level, as is the case with the International codes, eliminate the problem of conflicting and inconsistent language.

MN already adopts the International Building, Fire, Mechanical, Fuel Gas, Residential, and Accessibility codes on a statewide basis. The International Property Maintenance Code is adopted at the local level by a number of jurisdictions. DLI staff members have said that the state is moving toward adoption of the International Energy Conservation Code and have had conversations about adopting the International Green Construction Code and the International Existing Buildings Code. Additionally the plumbing board has been requested to adopt the International Green Construction Code-Water Efficiency Provisions extract.

Adopting any plumbing code other than the IPC is an invitation to conflicting requirements and regulatory barriers to optimal economic efficiency.

As a matter of policy the American Institute of Architects, the National Association of Home Builders, The National Multi-Housing Council, and Building Owners and Managers Association International support the single, correlated code set principle. AIA states it clearly:

“The AIA supports regulation by a single set of comprehensive, coordinated, and contemporary codes and standards, which establish sound threshold values of health, safety, and the protection of the public welfare throughout the United States.”

The only single set of comprehensive, coordinated, and contemporary codes and standards is the International codes.

Participation and Support

International plumbing code provisions are developed with the broad participation of industry, government, and the public. Members of the hearing committees establishing the content of the International codes plumbing provisions include representatives of the United Association (labor), the Plumbing Heating Cooling Contractors' Association, the American Society of Plumbing Engineers, the National Association of Home Builders, manufacturers, state and local regulators, and individual plumbing contractors.

Local chapters of the US Green Building Council, the American Society of Heating, Refrigerating and Air Conditioning Engineers, and the Building Owners and Managers Association have all endorsed the adoption of the IPC as has the Target Corporation. Polling by the local chapter of the American Society of Plumbing Engineers reveals its members support the adoption of the IPC by a nearly two to one margin.

Perhaps most significantly, all of the six chapters of building officials in MN have voted unanimously to support the adoption of the International codes plumbing provisions. These

chapters represent the more than 800 people in MN who day in and day out are required to administer the provisions of the code and to serve as the local experts on its requirements.

With all of the other parties involved in the discussion it's fair to say that the code affects their business. With the officials who administer the code's requirements you must say that the code *is* their business.

Summary

- There are no technical disadvantages to adopting the International plumbing code provisions and little if any impact on licensing reciprocity agreements.
- The MN state plumbing board retains control of amending the technical and administrative content of the code.
- Many MN plumbing inspectors are certified in a program designed to transition to certification in the International codes.
- Training in the additional options offered by current methods and materials will be needed regardless of which model code is adopted.
- Local government realizes economic benefits in an International code environment when training or participating in code development.
- The International codes offer prescriptive compliance language with the design flexibility of performance options.
- The International codes have the advantage of ease of use because of commentaries and the ability to put all plumbing and mechanical code language in a single document.
- Only the International plumbing code requirements are correlated at the national level with the other codes adopted in MN.
- There is broad participation by affected parties in the development of, and support for, the International plumbing codes provisions.

Conclusion

There is no substantive reason to reject the adoption of the International Plumbing Code in MN. Any other decision calls into question the underlying motivations and risks the attention of elected officials who vigorously oppose cumbersome regulation. Adopting the International Plumbing Code clearly demonstrates the board's commitment to efficient and effective regulation and affirms its value as the authority having jurisdiction of plumbing regulation in Minnesota.

Submitted by Arvella Greenway, member of Plumbers Local 15 Minneapolis, MN

2-27-2013

Arvella M. Greenway arvella.greenway@gmail.com

Comments on Possible Amendment to Rules Governing the Minnesota Plumbing Code,
Minnesota Rules, Chapter 4715; Revisor's ID Number R-4139

General: The adoption of the 2012 Uniform Plumbing Code by the State of Minnesota is overall a positive thing as it brings the state in line with a national code that is recognized as one of the best in the country.

RECEIVED
MAR 04 2013
DEPT. OF LABOR & INDUSTRY
LEGAL SERVICES

- Chapter 3

301.3.1 Flood Hazard Areas Subject to High Velocity Wave Action: Does not apply in Minnesota

Table 313.1 Hangers and Supports:

Cast Iron Hubless- Support should be on both sides of the coupling within 18"

Schedule 40 PVC and ABS DWV- Support should be every 32" and continuously supported where a dishwasher or other appliance with hot water discharges into plastic waste lines above grade on a horizontal branch.

- Chapter 4

405.2 Continuous Wastes: No. 17 B&S Gauge would last longer than No. 20 and offer continuity with other sections of this Code under traps.

407.2 Special Use Sinks: Restaurant kitchen equipment shall be NSF approved of stainless steel material.

408.7 Lining for Showers and Receptors: Nonmetallic shower subpans and linings consisting of 3 layers of standard grade asphalt impregnated roofing felt should be omitted as there are better and less expensive products on the market.

415.3 Drainage Connection: Drinking Fountains shall be connected directly to the drainage system. Omit indirectly through an air break as it could pose a sanitary risk.

420.3 Waste Outlet: No. 17 B&S Gauge would last longer than No. 20 and offer continuity with other sections of this Code under traps.

- Chapter 6

601.2.2 Color and Information: Marking should not only be required "every 20' but not less than once per room, and shall be visible from the floor", but also on each side of partitioning wall penetrations.

603.5.4 Heat Exchangers: The current Minnesota Single Wall Heat Exchanger standard is very clear and very safe. With the proposed change the system will be permanently marked and only "safe" transfer mediums are supposed to be introduced into the system, but there is no fail safe.

603.5.11 Nonpotable Water Piping: All cross connections between non-potable and potable piping must be corrected.

604.2 Copper Tube: Type M copper tube should not be allowed underground.

605.6 Galvanized Steel Pipe and Joints

605.6.1 Mechanical Joints: Shall be of a cut groove type.

- Chapter 7

704.2 Single Vertical Drainage Pipe: A side by side installation would be hard to service.

705.10.2 Expansion Joints: If expansion joints are allowed all expansion joints shall be accessible.

712.1 Testing Media: we have been successfully air testing plastic piping for years and would find it hard to perform a water test in the middle of the winter on an unheated jobsite.

- Chapter 9

902.2 Bars, Soda Fountains, and Counter: We have not run into a circumstance where it is impossible to vent these fixtures with island vents, so Omit not needing to be vented and being able to be drained into a floor sink indirectly.

906.1 Roof Termination and 906.7 Frost or Snow Closure: The proposed 10" would be covered by most winters. We should keep the current minimum of 12" above.

911.1 General: Since this section is titled Engineered Vent System is the registered design professional a professional engineer or a licensed plumbing contractor?

- Chapter 10

1017.0 Oil and Flammable Waste Interceptors

1017.1 Interceptors Required: Shall be installed in covered parking garages housing 4 or more vehicles. Define "Covered" as not open to the sky to directly receive rainwater.

- Chapter 11

1101.1 Where Required: Storm water shall not be directed to flow over public sidewalks.

1101.5.2 Sump: Sump covers shall be of a structural design and the discharge piping shall have an approved backwater valve and gate or full port ball valve for servicing the pump.

1101.11.2.2{B} Combined System: If a combined system is approved flow switches shall be installed on the horizontal overflow system before the combined connection and shall be monitored.

- Appendix D

Sizing Storm Water drainage Systems: We currently use a 4" per hour model to size rain leader systems; the Table D1.1 would have us use a 3" model which would decrease pipe sizes and increase flow velocities and pressures. The University of Minnesota's Climatology Center gives a rate of 5.7" per hour for a hundred year event or a 1% chance event. There are multiple lawsuits and insurance claims every year from rain leaders blowing apart from the current sizing method. Reducing the pipe sizing further would be irresponsible. At a minimum we should keep our current standard of 4" per hour or even increase it to protect property.

- Appendix I

Installation Standard for ABS Building Drain, Waste and Vent Pipe and Fittings:

2.3.2 Support: Shall be continuous if a dishwasher discharges into a horizontal line above grade.

Table 1 Thermal Expansion Table: Temperature variations in Minnesota are -20 degrees F to 100 degrees F. Runs over 35 feet will expand and contract enough to break the branch intervals off, or push them up taking the pitch out of the horizontal branch lines no matter how well they are anchored to prevent such from occurring.

Installation Standard for PVC Building Drain, Waste, and Vent Pipe and Fittings

2.5.2 Support: Shall be continuous if a dishwasher discharges into a horizontal line above grade.

Table 1 Thermal Expansion Table: Temperature variations in Minnesota are -20 degrees F to 100 degrees F. Runs over 35 feet will expand and contract enough to break the branch intervals off, or push them up taking the pitch out of the horizontal branch lines no matter how well they are anchored to prevent such from occurring.

Peters, Kelli (DLI)

From: Jeff Hill <jeffhill@hillwater.com>
Sent: Monday, March 04, 2013 1:51 PM
To: DLIRULES (DLI)
Cc: Mike McGowan
Subject: Comment - Plumbing Board - Possible National Code - R-4139
Attachments: MWQA Plumbing Board R-4139.pdf; GPDOCS1-#3231951-v2-Suggested Languarg
Drinking_Water_Treatment_Units.DOCX

Please accept these comments for the Plumbing Board from the Minnesota Water Quality Association on the proposed rule to adopt a national plumbing code.

Thank you.

Jeffrey B. Hill
952/925-1444 o
952/925-1445 x 114 dir & vmx
952/925-1471 f
612/369-7802 c



John Parizek
Minnesota Plumbing Board
Department of Labor and Industry
c/o Kelli Peters
443 Lafayette Road N.
St. Paul, MN 55155.

RE: Comment submission regarding Possible Amendment to Rules Governing the Minnesota Plumbing Code, *Minnesota Rules*, Chapter 4715; Reviser's ID Number R-4139

Dear Mr. Parizek:

The Minnesota Water Quality Association appreciates the opportunity to comment on the proposed plumbing code changes.

- I) General. We have reviewed section 611.0 of the 2012UPC and find it unclear, difficult to enforce and possibly requiring dramatic and unnecessary changes to the water conditioning business in Minnesota. For example, section 611.0 does not allow licensed plumbers and water conditioning contractors to build custom systems responsive to the unique needs of Minnesota customers; the specific design standards and third party testing, which the UPC seems to require, will severely reduce innovation and limit the number and diversity of products now available in Minnesota; and, the UPC uses NSF/ANSI standards in a way that will add cost and uncertainty to water conditioner installation and servicing in Minnesota. We suggest the attached alternate wording that significantly improves this code.
- II) Public Health and Consumer Protection. The Minnesota Plumbing Code is currently focused on safety and protection of human health. The language of the UPC, with its NSF/ANSI standards, mixes manufacturing quality and consumer protection into the Plumbing Code in a way that is without precedent in Minnesota and has yet to be discussed in a public forum. For example, it significantly enlarges the role of the Department of Labor and Industry in analyzing equipment. It is not clear how this review would occur, over what period of time, and what cost to the public.

- III) NSF/ANSI Standards. The reference to a number of developing NSF standards in 611.1 is the most troubling. These standards will have significant detrimental impact on plumbing and water treatment businesses in Minnesota and the consumers that use their services. Much of the text of the standards listed addresses specific manufacturing issues and the testing of the devices by a third party, NSF or another corporation. Third party testing is not currently widespread for many of these devices and is neither appropriate nor necessary in many instances.
-
- IV) Custom Water Treatment. Water treatment in Minnesota often requires the custom application of multiple technologies unique to the conditions of a customer's home, business or manufacturing facility. This practice has successfully provided water quality treatment for individual consumers and for Minnesota industry. The 2012 UPC code with NSF product testing rejects the engineering and ingenuity involved in the plumbing and water treatment community and assumes that a short list of standardized products, which can be mass produced and sold, will be universally effective. This does not reflect the experience of the plumbing and water treatment industry in Minnesota, particularly in rural areas of the State with very challenging water conditions.
- V) Missing -- NSF/ANSI 61, Plumbers and Water Conditioning Contractors. NSF/ANSI standard 61 has been developed to address the safety of the components used in water treatment systems. Over the last 15 years there has been a growing acceptance of this concept. In recent years many suppliers have worked through the testing and fees necessary and are now providing certification of their materials. This is a developing area not reflected in the UPC code. Minnesota licensed plumbers and water conditioning contractors should be able to select from among these certified materials in designing and installing water conditioning systems. Without that flexibility, plumbers and water conditioning contractors will be hand-tied in their efforts to successfully address unique water quality conditions.
-
- VI) Unknown or Arbitrary Enforcement. We understand from the Water Quality Association that officials in states using the UPC have not yet begun to enforce third party testing, and that because of the logistical and other challenges that testing presents, it may not be required by the code. This means that 1) there is not yet the expertise to enforce a third party testing requirement, and 2) enforcement will be local and arbitrary. This is not an acceptable way to develop a code and we urge you not to adopt third party testing, at least until more is known about how it can be effectively and efficiently implemented

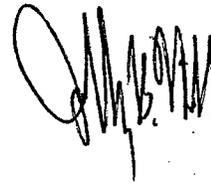
VII) Summary. There are a number of significant changes to the water conditioning industry imposed by strict adherence to the UPC 2012 code. Section 611.0 is a simplistic, inadequate attempt to define a large and effective industry in Minnesota – one that is advancing rapidly. The proposed changes are not appropriate, have not been championed by any group nor are they required by any demonstrated need. We suggest that our proposed language, which requires contractors to assume responsibility for ensuring that water conditioning systems are made of safe materials and safe to human health, is an appropriate base from which to build a Code.

Sincerely,

MINNESOTA WATER QUALITY ASSOCIATION



Michael McGowan, CWS-III
President



Jeffrey B. Hill, CWS-VI
Chair, Governmental Affairs

611.0 Drinking Water Treatment Units

611.1 Application. Water conditioning systems shall comply with the standards in this section.

611.1.1 Definition. A water conditioning system is any equipment, apparatus or device, or any combination thereof, installed in a water distribution system to improve water quality for any purpose. Water conditioning systems include but are not limited to ion exchange water softeners, backwashing water filters, oxidizing water filters, cartridge filters, chemical feed cartridges, ultraviolet lights, membrane processes reverse osmosis and ultrafiltration and nanofiltration, acid reduction, nitrate and arsenic removal and adsorption onto activated carbon.

611.1.2 Design and Construction. Water conditioning systems may be manufactured as a complete system or designed and constructed for a specific application.

611.1.2.1 Safe Materials. Water conditioning systems shall be made of safe materials so as not to degrade the safety of water for human consumption.

611.1.2.2 Principal Standard. The principal standard for materials safety is the requirement prohibiting the imparting of materials into potable water as defined in ANSI/NSF 61.

611.1.3 Labeling. Every water conditioning system must be labeled by the manufacturer or by the licensed water conditioning contractor who designed and constructed the system so as to clearly identify the type of device and the name and address of the manufacturer or licensed contractor who designed and constructed the system.

611.2 Airgap Discharge. Discharge from drinking water treatment units shall enter the drainage system through an airgap in accordance with Table 603.3.1 or an airgap device in accordance with Table 603.2, NSF 58, or IAPMO PS 65. Salt regenerating and backwashing water treatment systems are low hazard devices and require no more backflow protection than provided by a properly sized airgap in accordance with Table 603.3.1.

611.3 Connection Tubing. The tubing to and from drinking water treatment units shall be of a size and material as recommended by the manufacturer. The tubing shall comply with the requirements of NSF 14, NSF 42, NSF 44, NSF 53, NSF 55, NSF 58, NSF 62 or the appropriate material standards referenced in Table 1401.1.

611.4 Sizing of Residential Softeners. Residential-use water softeners shall be sized in accordance with Table 611.4.

TABLE 611.4

SIZING OF RESIDENTIAL WATER SOFTENERS⁴

REQUIRED SIZE OF SOFTENER CONNECTION (inches)	NUMBER OF BATHROOM GROUPS SERVED ¹
3/4	Up to 2 ²
1	Up to 4 ³

For SI units: 1 inch = 25 mm

Notes:

- ¹ Installation of a kitchen sink and dishwasher, laundry tray, and automatic clothes washer permitted without additional size increase.
- ² An additional water closet and lavatory permitted.
- ³ Over four bathroom groups, the softener size shall be engineered for the specific installation.
- ⁴ See also Appendix A, Recommended Rules for Sizing the Water Supply System, and Appendix C, Alternate Plumbing Systems, for alternate methods of sizing water supply systems.

Peters, Kelli (DLI)

From: Soderbeck, Gene (MPCA)
Sent: Monday, March 04, 2013 2:19 PM
To: DLIRULES (DLI)
Cc: Wespetal, Mark (MPCA)
Subject: Proposed Plumbing Code (Chapters 16)

Kelli Peters, MN Plumbing Board
c/o Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155

Dear Ms. Peters,

This letter is in response to your request for comments concerning proposed amendments to MN R. Chapter 4715 (State Register - 11/13/2012). Our understanding is that the current plumbing code is proposed to be replaced by the Uniform Plumbing Code (UPC) with amendments.

The MPCA's subsurface sewage treatment systems program reviewed chapters 16 and 17 of the UPC. The agency requests that the UPC be amended to remove all design standards or licensing requirements for any system whose function is the final treatment and dispersal of wastes to the environment (either surface or subsurface). Final treatment and dispersal provisions are currently regulated in Minnesota by MN Rules Chapters 7080 – 7083. If the treatment and dispersal of wastes to the environment remain in the adopted UPC, there will be two sets of provisions in the state that will conflict.

If you have any questions, please contact either Mark Wespetal at Mark.Wespetal@state.mn.us or telephone at 651-757-2817 or me by email or telephone at 651-757-2743.

Sincerely,

Gene M. Soderbeck, P.E., Supervisor
Municipal Division



MAYER SOFT WATER CO.
203 SOUTH FRONT STREET - P.O. BOX 296
ST. PETER, MINNESOTA 56082-0296

RECEIVED

March 1, 2013

MAR 05 2013

Kelli Peters
Minnesota Plumbing Board
c/o Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155

DEPT. OF LABOR & INDUSTRY
LEGAL SERVICES

re: Amending Minnesota Plumbing Code

NSF requirements on all water treatment systems.

Has this issue been a problem in Minnesota? If so, what has been the historical, documented impact of not meeting these standards? There have been no publicly reported incidences of damages or consumer inconvenience resulting from failure of systems not currently meeting the proposed NSF requirements. Should this particular change be adopted, significant costs will result for the consumer choosing to seek a trained water professional who will have been forced to absorb additional costs from the manufacturer as well as the costs of training, inspection, administrative, and travel expense of public sector personnel. This raises the question of the compliance of "big box," cash and carry products. Who will enforce possible noncompliance from these sources and the installation by family acquaintances? Perhaps any actual failures of existing equipment not meeting the proposed requirements would be difficult to assess with municipal water pressures and quality that change significantly from treatment processes and additives. In St. Peter a failure of a major component of the new water treatment facility caused water pressure to sporadically vary from 80 psi to 110 psi throughout any given day for several weeks in the summer of 2012 causing failure of PRV on many water heaters, a situation not disclosed to the public by the utility. In addition, changes in disinfection chemicals and composition has caused premature failure of rubber and certain plastic components in fixtures and appliances, another situation not publicly acknowledged resulting in additional consumer expense as well. Regarding trained public inspectors uncertain and unwilling to scrutinize proper application of existing code, the proposed code will make that possibility more likely.

Disallow Water Conditioning Masters to install, or service units in commercial buildings.

Water Conditioning Masters have been trained by the manufacturer and have taken all required courses from the licensing authority to practice their trade. We have



TELEPHONE: (507) 931-2393

Serving Nicollet, LeSueur, and Sibley Counties

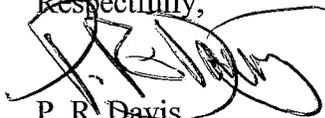
worked side by side with Master Plumbers throughout most of our careers, being instructed and educated at the job site on task. Most plumbers have no inclination to add the complexities, the chemistry, and proper application of treatment in addition to their overall professionalism. Add a Master Plumber and a newly trained inspector to the process of specialized water treatment and, again, the consumer is forced to absorb additional costs, wasteful time waiting to muster the proposed additional personnel, and any product or material during the additional time to assemble the necessary staff.

Clarification of usage of poly tubing on drinking water units.

Drinking water equipment at the Point Of Use, is more aggressive than raw water. Eliminating any barriers between the manufacturer and the consumer helps control inflationary pressures in the home. We already know large scale and municipal reverse osmosis applied to existing ferrous distribution systems accelerates system failure. Poly tubing properly protected by components of the drinking water filtration stages will assure longer life of the system helping reduce premature maintenance and replacement costs.

In closing, the current plumbing code has served the consumer well. Any significant changes to the code should reflect water conservation and sustainability. Changes to the plumbing code should focus upon correcting instability from municipal practices that have proceeded with little or no advice or experience from Master Plumbers and Water Conditioning Masters with hands-on and field experience. Many years ago St. Peter required system wide back flow prevention just after point of entry. The failure rate was extreme causing significant damage. The consumer was forced to pay for compliance, pay for any consequential damages from the component failure, and then had to pay to have the device removed on advice from the municipality. To add insult to injury, the city caused a back flow in a neighborhood during the late spring of 2012. Thank you.

Respectfully,



P. R. Davis

WC057856

Mayer Soft Water

dba Culligan

P. O. Box 296

203 South Front Street

St. Peter, MN 56082-0296

(507)931-2393

AR2024/R-4139

Munkel-Olson, Patricia (DLI)

From: DLIRULES (DLI)
Sent: Thursday, December 13, 2012 3:24 PM
To: Munkel-Olson, Patricia (DLI)
Subject: FW: Jim.lungstrom@state.mn.us, cathy.tran@state.mn.us, gene.soderbeck@state.mn.us, charlie.thompson@state.mn.us, gusta002@umn.edu,, mark.wespetal@state.mn.us
Attachments: memo plumbing code workshops.docx; Petition OSTP workshop.pdf

From: Sara Heger [mailto:sheger@umn.edu]
Sent: Thursday, December 13, 2012 2:56 PM
To: DLIRULES (DLI)
Subject: Jim.lungstrom@state.mn.us, cathy.tran@state.mn.us, gene.soderbeck@state.mn.us, charlie.thompson@state.mn.us, gusta002@umn.edu, mark.wespetal@state.mn.us

Kelli,

See the attached comment regarding the possible amendments Chapter 4715.

Please let me know if you questions.

Sara

--

Sara Heger
University of Minnesota
Water Resource Center
Onsite Sewage Treatment Program
1985 Buford Ave, 173 McNeal Hall
St. Paul, MN 55108

Email: sheger@umn.edu
Office phone: 612-625-7243
Cellular phone: 612-239-8918

Website: <http://septic.umn.edu>

UNIVERSITY OF MINNESOTA

*Onsite Sewage Treatment Program
Water Resources Center
University of Minnesota
Extension Service*

*Room 173 McNeal Hall
1985 Buford Avenue
St. Paul, MN 55108
800-322-8642
Fax: 612-624-6434
<http://septic.umn.edu>*

To: Kelli Peters, MN Plumbing Board, c/o Department of
Labor and Industry, 443 Lafayette Road North, St. Paul, MN 55155, dli.rules@state.mn.us

CC: Jim Lungstrom and Cathy Tran, DOLI, Jim.lungstrom@state.mn.us, cathy.tran@state.mn.us,
Gene Soderbeck and Charlie Thompson, MPCA, gene.soderbeck@state.mn.us,
charlie.thompson@state.mn.us

From: Sara Heger, University of Minnesota

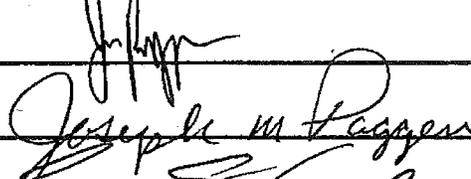
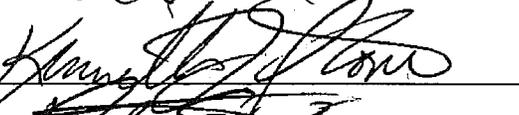
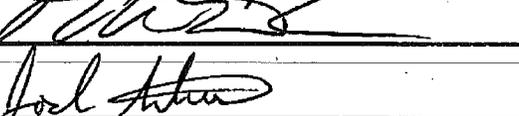
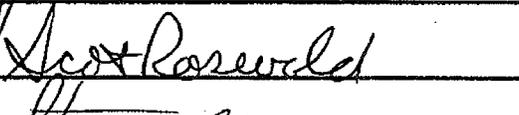
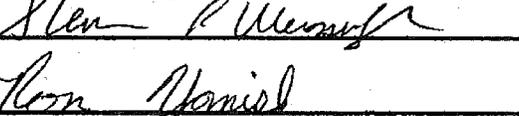
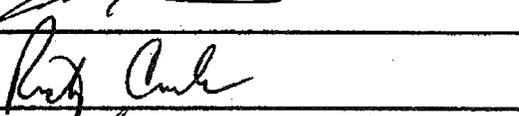
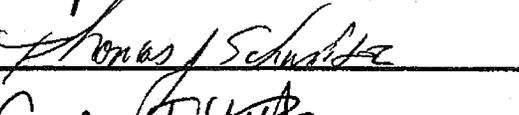
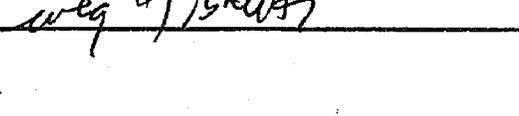
Re: Possible Amendment to Rules Governing the Minnesota Plumbing Code Minnesota
Rules, Chapter 4715; Revisor's ID Number R-4139

At the University of Minnesota Onsite Sewage Treatment Workshop General Continuing Education workshop held on December 5-6, 2012 in St. Cloud a discussion was held regarding the potential changes to Chapter 4715. There were some strong feelings about eliminating the requirement for SSTS licensed professionals to carry a pipelayer certification and plumbing bond to install the building sewer from dwellings to septic tanks. A member of the class started the attached position which I am providing to the Plumbing Board for consideration.

If there are questions feel free to contact me at sheger@umn.edu.

12/6/12

WE, THE UNDERSIGNED, REQUEST THAT THE STATE OF MINNESOTA
PLUMBING CODE BE REVISED TO NOT INCLUDE THE PIPE FROM A HOME
TO THE SEPTIC TANK.

	
	Lic 1453
	Lic 1853
	Lic 1107
	LIC. # 978
	Lic # 2823
	Lic # 1105
	# 1322
	Lic # 2705
	Lic # 1790
	Lic # 264
	Lic # 358
	# 1165
	# 2823
	# 1574
	# 959
	# 2904

12/6/12

WE, THE UNDERSIGNED, REQUEST THAT THE STATE OF MINNESOTA
PLUMBING CODE BE REVISED TO NOT INCLUDE THE PIPE FROM A HOME
TO THE SEPTIC TANK.

Chuck Loh	Schroeder MN	# 1116
Randy L. Olson	Wendell Mn.	# 3256
Jackie Block		# 3033
Ryan Sarkinen		Lic # 2307
Rick Reamer	Hastings Mn	Lic # 101
Mark Leaf	Cambridge MN.	Lic # 1460
Doug Hunt	Wadena	# 1260
Theresa L. Kowalzek	Piercy mn	?
Donald P. L.	Sokol mn	5751
Kim O'Q	BRAHAM MN	# 1141
Shirley	Mayer Mn	# 2395
Bruce R. J.	New London mn	# 767
Jan Jartul	Motley, mn	# 243
Wale Kerpohl	Hinckley M	L# 1654
Dennis Schlotzkes	Hinckley	L.# 1106
Julie Dale da		L587
Dennis M. M.	Coon Rapids mn	L-1126
John Affinis	Park Rapids	L# 2122

12/6/12

WE, THE UNDERSIGNED, REQUEST THAT THE STATE OF MINNESOTA
PLUMBING CODE BE REVISED TO NOT INCLUDE THE PIPE FROM A HOME
TO THE SEPTIC TANK.

Kyle Hill Morris MN Lic # L113
Jim Dunn Ancker Lic # 338
Jim Kotelnik Buffalo Lic # 483
Mike Austin Chicago Lic # 1343
Eugen A. Hansen Detroit Lakes P.E. CIVIL ENGINEER # 7618
Alexander Schmidt Alexandria, MN Lic # 258
Michael J Deck City of Nisswa R 5355
DAVE PERKINS RANGY MN # 76
Bruce Heubach Tower
Jerry Holman Embarrass
Scott Chabot Clear Lake 2804
Steve Egan Pelican Rapids, MN Lic # 209
Dan Egan Pelican Rapids MN Lic # 209
DALE GOENIGSMAN LESTER PARK MN
John Wadsworth Cross Lake MN Lic 925
James P Beard Ham Lake MN
KYLE HVEZDA ALEXANDRIA # 509
Paul J Smith Nisswa # 3464

12/6/12

WE, THE UNDERSIGNED, REQUEST THAT THE STATE OF MINNESOTA
PLUMBING CODE BE REVISED TO NOT INCLUDE THE PIPE FROM A HOME
TO THE SEPTIC TANK.

Randy Laze ST. Cloud Lic # 481
Gregor Swenson New London, MN Lic 648
Tony SHRE SPICER, MN Lic # 1832
Larry Hansen Becker, MN Lic # 2200
Al Jant Wadena MN
Carl Jant Wadena, MN
Cliff Jant St. Cloud MN Lic. # 772
Dell W St. Cloud MN (2804
Glen Sted Erhard MN # 1040
Joe Jay Eveleth MN

Munkel-Olson, Patricia (DLI)

From: Grant Edwards <grantandsarah@live.com>
Sent: Friday, February 15, 2013 2:46 PM
To: Munkel-Olson, Patricia (DLI)
Subject: RE: Comment to be reviewed by MN Plumbing Board

This is a comment from me personally that I wish to be officially submitted for consideration. I asked John Parizek where to direct them and see said to you. Is this right?

Grant

> From: Patricia.Munkel-Olson@state.mn.us
> To: grantandsarah@live.com
> Subject: RE: Comment to be reviewed by MN Plumbing Board
> Date: Fri, 15 Feb 2013 19:31:00 +0000
>
> Hi Grant,
>
> Is this comment in response to the Request for Comments?
>
> Pat
>
> -----Original Message-----
> From: Grant Edwards [<mailto:grantandsarah@live.com>]
> Sent: Friday, February 15, 2013 10:16 AM
> To: Munkel-Olson, Patricia (DLI)
> Subject: Comment to be reviewed by MN Plumbing Board
>
> Dear Pat,
>
> I wish to submit a comment to be reviewed by the Plumbing Board with a possible amendment that could result as the UPC is adopted in MN.
>
> There is a growing trend in large-scale, commercial new construction to pre-fabricate sections of plumbing systems. This is usually done in a controlled, factory-like environment. As this practice becomes more popular and commonplace, I think it would be prudent for the plumbing code to address this practice. Specifically, it may be wise to explicitly state that all pre-fabricated sections of a plumbing system to be installed anywhere in the state SHALL be assembled by licensed journeyman plumbers or state registered apprentices under the supervision of a bonded and insured master plumber contractor. I appreciate this matter being considered and look forward to discussing it further. Thank you.
>
> Sincerely,
> Grant Edwards
> MN Plumbing Board Member
>
>
>
>