

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES (This form must be submitted electronically)

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Proposed Code Change - Language

~~**Vent pipe materials.** Vent pipe materials shall be air duct material listed and labeled to the requirement of UL181 for Class 0 air ducts, or any of the following piping materials that comply as a building sanitary drainage and vent pipe: cast iron; galvanized steel; brass or copper pipe; copper tube of a weight not less than that of copper drainage tube, Type DWV; and plastic piping.~~

Proposed Code Change – Need and Reason

It is necessary that rules be reasonable and propose the use of materials that are readily available and cost effective. The draft rule for vent pipe materials significantly expands the types of materials that may be used for the vent pipe which is normally a good thing. But radon mitigation is a rather simple installation that is exclusively made up of plastic pipe and fittings because of their cost, ease of use, and ready availability.

The proposed draft suggests the use of “air duct material”. Air duct material is not recognized in the EPA handbook “Build Radon Out” as a viable vent pipe material. What is most likely to happen is that users of the code will read a few words and suspect that perhaps they could use plastic dryer duct. This will result in violations, correction notices, more calls to the building department to explain what a Class 0 duct is, and the need to have UL181 readily available.

The proposed draft also lists cast iron, galvanized steel, brass, or copper pipe. These materials are significantly more costly to use, require special tools, requires special skills by the installer, and have no history of being used in the radon mitigation world. The EPA booklet “Build Radon Out” does not recognize these materials as a viable vent material.

It is necessary to eliminate confusion for this simplistic code requirement by specifically stating what a vent pipe is. In a separate submittal, I have proposed a definition of the term “vent pipe” which follows.

VENT PIPE. *A vent pipe is a minimum 3-inch diameter (76 mm) ABS or PVC pipe extending from the gas permeable layer through the soil-gas-retarder, the conditioned space of the dwelling, and the attic and terminating at least 12 inches (305 mm) above the roof in a location at least 10 feet (3,048 mm)*

away from any window or other opening into the conditioned spaces of the dwelling that is less than 2 feet (610 mm) below the exhaust point.

This is what industry uses and will continue to use. If someone wishes to use a different material, Chapter 1300 of the Minnesota Building Code permits the building official to consider alternate materials and methods of construction.

It is reasonable to delete this language because it proposes use of materials not recommended by EPA, materials that require significantly different skill sets, and materials that cost significantly more money to buy and install.

Proposed Code Change – Cost/Benefit Analysis

This proposal will have no impact on the cost of construction.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.

No

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

Yes, Radon Rules

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.

No

5. Who are the parties affected or segments of industry affected by this proposed code change?

Code officials, building designers, contractors, building owners

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

No

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.

No