

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

We propose a modification of Minnesota rule 1307.0067 subpart 1 (which amends ASME 17.1 Section 2.2.2.4), amending the paragraph to read as follows (including current, ~~stricken~~ and new verbiage):

“An elevator pit drain must discharge to the sanitary sewer using an indirect connection that precludes the possibility of sewage backup into the pit. If a sump is used, it must be located outside the pit with a dry pan drain flowing to it. The sump for the elevator pit drain must not be located in the elevator machine room. Sumps shall be permitted to be installed on existing elevators. If a new sump is added to an elevator, no pumps, electrical devices, or mechanical devices that require maintenance shall be allowed in the pit. The new sump shall be installed in accordance will all applicable plumbing codes.”

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that is has considered all aspects of the proposal. (You may provide the need and reason electronically on a separate attached sheet).

The argument behind a request for a verbiage change begins with ASME A17.1 Interpretations No. 30, Inquiry 07-14 which refers to ASME A17.1-2004 section 6.1.3.15 which indicates: “Permanent provisions shall be made to prevent accumulation of water in the pit. Drains and sump pumps, where provided, shall comply with 2.2.2.4.”

The ASME A17.1 section 2.2.2.4 that is referred to in the Requirement 6.1.3.15 reads as follows:

“Drains and sump pumps, where provided, shall comply with the applicable plumbing code, and they shall be provided with a positive means to prevent water, gases, and odors from entering the hoistway.”

Minnesota Rule 1307.0067 subpart 1 (proposed to be eliminated above) is an amendment from ASME A17.1 section 2.2.2.4, adding a paragraph that reads as follows:

“An elevator pit drain must discharge to the sanitary sewer using an indirect connection that precludes the possibility of sewage backup into the pit. If a sump is used, it must be located outside the pit with a dry pan drain flowing to it. The sump for the elevator pit drain must not be located in the elevator machine room.”

Further reasoning behind the argument for a change in verbiage of ASME A17.1 section 2.2.2.4 can be found within the exception clause of Chapter 30 of the IBC (2006) in section 3004.4 that reads as follows:

“Plumbing and mechanical systems. Plumbing and mechanical systems shall not be located in an elevator shaft. Exception: Floor drains, sumps and sump pumps shall be permitted at the base of the shaft provided they are indirectly connected to the plumbing system.”

I believe that the intent of the amendment provided within Minnesota Rule 1307.0067 subpart 1 was to eliminate the potential for harm to persons or equipment that might result from non-elevator personnel being allowed entry to an elevator pit. Since there are a number of safety precautions required prior to pit entry, laypersons and unrelated workers could suffer or cause harm.

Proposed Code Change - Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

The proposed code change will defer authority to the plumbing code and plumbing authorities, thus eliminating the need for elevator inspectors to make rulings in cross-jurisdictional issues including items that are already covered in applicable plumbing codes.

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).

Amendment is to ASME A17.1 section 2.2.2.4

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

MN RULE 1307.0067 subpart 1 is an amendment from ASME A17.1 section 2.2.2.4. Our proposition requests a modification of the present verbiage of 1307.0067 subpart 1 and inclusion of a new amendment to ASME A17.1 section 2.2.2.4 as amended in the section entitled "Proposed Verbiage".

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.
None other than listed in question 1 above

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.
The change will may impact the plumbing code section 4715.1305 that was changed August 13, 2009 at the request of the previous elevator code developers

5. Who are the parties affected or segments of industry affected by this proposed code change?
Building owners and Minnesota water abatement companies

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.
ASME A17.1 section 2.2.2.4

