

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

Author/requestor: Frank Richie

Email address: Frank.Richie@ci.Minneapolis.mn.us

1346, IMC # 4

Telephone number: 612-685-8523

Firm/Association affiliation, if any: City of Minneapolis; Construction Inspections; Regulatory Services

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.

404.4 All garage exhaust ducts shall extend directly to the exterior of the building and shall not extend into or through other ducts or plenums.

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 it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

The reason I believe this change is needed is because some in the industry and various jurisdictions identify this type of exhaust as an environmental air duct only without any regard to the toxin being exhausted. NFPA 704 identifies carbon monoxide as a toxic material having a health rating of 4. Chapter 5 section 510.2 Where required, identifies a vapor, gas, fume, mist or dust with a health hazard rating of 4 as requiring to be treated as a hazardous exhaust system. Because a garage exhaust system is not required to operate continuously, a high concentration of a number 4 material may build up inside of the duct system long before the carbon monoxide detectors activate the exhaust fan to discharge this air. If the garage exhaust duct passes through a plenum and has a build up of this toxin within it, the toxin may end up mixing with the building air during the off cycle of the garage exhaust.

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.)

None. I believe if this change is known in the design stage of a project than it should not increase cost to install this type of system.

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)

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

Chapter 4 Section 404. Add a subpart section 404.4 to read garage exhaust shall not extend into or through ducts and plenums.

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.

Unknown

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.

Unknown

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.

Unknown

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

Mechanical engineers and/or contractors as well as Architect personal.

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.

Perhaps by identifying garage exhaust as a hazardous exhaust in accordance with section 510 would satisfy the proposed code change however this would add additional cost to garage exhaust systems if all provisions of section were followed and I believe not all provisions of section 510 need to be applied to garage exhaust systems. That is why I believe this proposed change would be preferred.

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