

Plumbing Board
c/o Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155-4344
www.dli.mn.gov

Plumbing Board Request for Action

PRINT IN INK or TYPE

NAME OF SUBMITTER	PURPOSE OF REQUEST (check all that apply): <input type="checkbox"/> New Code <input checked="" type="checkbox"/> Code Amendment <input type="checkbox"/> Repeal of an existing Rule
Minnesota Department of Health	
The Minnesota Plumbing Code (MN Rules, Chapter 4714) is available at https://epubs.iapmo.org/2020/MPC/	
Specify the purpose of the proposal: If recommendation for code change for appurtenance or method (check all that apply)	
<input type="checkbox"/> Appurtenance (e.g., water conditioning equipment) <input type="checkbox"/> Test Method	
<input checked="" type="checkbox"/> Other (describe) <u>Backflow prevention for recreational vehicle sanitary disposal station</u>	

Does your submission contain a Trade Secret? ☐ Yes ☒ No

If Yes, mark “**TRADE SECRET**” prominently on each page of your submission that you believe contains trade secret information. Minnesota Statutes, section 13.37, subdivision 1(b), defines “trade secret” as follows:

“Trade secret information” means government data, including a formula, pattern, compilation, program, device, method, technique or process (1) that was supplied by the affected individual or organization, (2) that is the subject of efforts by the individual or organization that are reasonable under the circumstances to maintain its secrecy, and (3) that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Note that, although “trade secret” information is generally not public, the Board and its committees may disclose “trade secret” information at a public meeting of the Board or committee if reasonably necessary for the Board or committee to conduct the business or agenda item before it (such as your request.) The record of the meeting will be public.

Describe the proposed change. The Minnesota Plumbing Code (Minnesota Rules Chapter 4714) is available here: <https://epubs.iapmo.org/2020/MPC/>

NOTE:

- Please review the Minnesota Plumbing Code and include all parts of the Code that require revision to accomplish your purpose.
- The proposed change, including suggested rule language, should be *specific*. If modifying existing rule language, underline new words and ~~strike through deleted words~~. Please list all areas of the Minnesota Plumbing Code that would be affected.

We are asking for clarity in the code as to what listed backflow prevention devices are allowable for sanitary disposal stations. A list of devices such as is provided in 603.5.6 Protection from Lawn Sprinklers and Irrigation Systems is requested.

We are also suggesting some added language to clarify the design and intended use of the dump station.

The revisions will be somewhat dependent on the listed devices that are approved (see “*” below - we are not sure if these devices are acceptable. If not, then the AVB could just be listed in the main paragraph).

724.2 Flushing Device. The recreational vehicle sanitary disposal station flushing device shall consist of a supported riser terminating not less than 2 feet (610 mm) above the ground surface, with a 3/4 inch (20 mm) valved outlet adaptable for a flexible hose. The flexible hose shall be designed such that it cannot lie on the ground and shall have an unthreaded outlet. The water supply to the flushing device shall be protected from backflow by means of a high hazard device listed in Table 603.2 ~~vacuum breaker or backflow prevention device~~-located downstream from the last shutoff valve.

A pressure-type vacuum breaker backflow prevention assembly (PVB), a spill-resistant pressure vacuum breaker assembly (SVB) device, or reduced-pressure principle backflow prevention assembly (RP) must be provided if a shut-off valve is installed downstream of the backflow device.

Direct connections between:

- (1) The water piping and sewer-connected waste piping; and
- (2) The water piping and the recreational vehicle holding tank;

are not allowed to exist under any condition with or without backflow protection.

Adjacent to the recreational vehicle sanitary disposal station shall be posted a sign of durable material not less than 2 feet by 2 feet (610 mm by 610 mm) in size. Inscribed on the sign in clearly legible letters shall be the following:

“DANGER – NOT TO BE USED FOR DRINKING OR DOMESTIC PURPOSES. NO DIRECT OR ADDITIONAL CONNECTIONS ALLOWED DURING FLUSHING.”

Office Use Only			
RFA File No.	Date Received by DLI	Dated Received by Committee	Date of Forwarded to Board
PB0191	Revised 4/29/2025, 2/25/2025	4/29/2025, 3/5/2025	
Title of RFA	By:		
PB0191.RFA.Anita Anderson MDH Section 724.2			
Committee Recommendation to the Board: <input type="checkbox"/> Accept <input type="checkbox"/> Reject <input type="checkbox"/> Abstain			
Board approved as submitted: <input type="checkbox"/> Yes <input type="checkbox"/> No		Board approved as modified: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Need and Reasons For the Change. Thoroughly explain the need and why you believe it is reasonable to make this change. During a rulemaking process, the need and reasonableness of all proposed rule changes must be justified; therefore, a detailed explanation is necessary to ensure the Board thoroughly considers all aspects of the proposal.

Inadequate backflow prevention at recreational vehicle (RV) sanitary disposal stations is a common plumbing defect that Minnesota Department of Health (MDH) sanitarians come across during sanitary surveys of noncommunity public water systems. The proposed change to the code provides clarity as to what backflow prevention devices are acceptable for the flushing device at RV sanitary disposal stations. MDH has responsibility and authority to prevent unsafe water connections under Minnesota Rules, part 4720.0025. MDH partners with DLI to resolve the issues. Providing clarification in the Minnesota Plumbing Code will aid both parties in this effort.

We are proposing the additional “Danger” language because there are many YouTube videos showing direct connections to flushing ports and users of the stations should be aware of the hazards of such connections.

If your product/method standard(s) is not currently listed in both national codes, your Request For Action will not be considered by the Board or its committees, however, you are welcome to present at any Board meeting during the Open Forum section of the Agenda.

The proposal must be accompanied by copies of any published standards, the results of testing, and copies of any product listings, as documentation of the health, sanitation and safety performance of any materials, methods, fixtures, and/or appurtenances. If none are available, please explain:

We are not proposing any new methods or products, just a clarification of requirements using listed devices

Please attach electronic scanned copies of any literature, standards and product approvals or listings. Printed or copyrighted materials, ***along with written permission from the publisher to distribute the materials at meetings***, and email to DLI.cclboards@state.mn.us

Primary reason for change: (check only one)

- | | |
|---|--|
| <input type="checkbox"/> Protect public, health, safety, welfare, or security | <input type="checkbox"/> Mandated by legislature |
| <input type="checkbox"/> Lower construction costs | <input type="checkbox"/> Provide uniform application |
| <input type="checkbox"/> Encourage new methods and materials | X Clarify provisions |
| <input type="checkbox"/> Change made at national level | <input type="checkbox"/> Situation unique to Minnesota |
| <input type="checkbox"/> Other (describe) _____ | |

Anticipated benefits: (check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> Save lives/reduce injuries | <input type="checkbox"/> Provide more affordable construction |
| X Improve uniform application | <input type="checkbox"/> Provide building property |
| <input type="checkbox"/> Improve health of indoor environment | X Drinking water quality protection |
| <input type="checkbox"/> Provide more construction alternatives | <input type="checkbox"/> Decrease cost of enforcement |
| <input type="checkbox"/> Reduce regulation <input type="checkbox"/> Other (describe) _____ | |

Economic impact: (explain all answers marked "yes")

1. Does the proposed change increase or decrease the cost of enforcement? ☐ Yes X No If yes, explain

2. Does the proposed change increase or decrease the cost of compliance? ☐ Yes X No If yes, explain
Include the estimated cost increase or decrease, and who will bear the cost increase or experience the cost decrease:

3. Are there less costly or intrusive methods to achieve the proposed change? ☐ Yes X No If yes, explain

4. Were alternative methods considered? ☐ Yes X No If no, why not? If yes, explain what alternative methods were considered and why they were rejected.

We are only clarifying the code, we are not proposing any changes to the requirements.

5. If there is a fiscal impact, try to explain any benefit that will offset the cost of the change. If there is no impact, mark "N/A." N/A

6. Provide a description of the classes of persons affected by a proposed change, who will bear the cost, and who will benefit. The proposal clarifies but does not change the requirements for backflow prevention at sanitary disposal stations. The benefit of clarification will be increased protection of public health because owners and operators of the stations will understand the requirements and can better work with plumbers to make corrections.

7. Does the proposed rule affect farming operations? (Agricultural buildings are exempt from the Minnesota Building Code under Minnesota Statutes, Section 326B.121.) ☐ Yes X No If yes, explain

Are there any existing Federal Standards? ☐ Yes X No If yes, list:

Are there any differences between the proposed change and existing federal regulations? ☐ Yes ☐ No
X Not applicable ☐ Unknown If yes, describe each difference & explain why each difference is needed & reasonable.

Minnesota Statutes, section 14.127, requires the Board to determine if the cost of complying with proposed rule changes in the first year after the changes take effect will exceed \$25,000 for any small business or small city. A small business is defined as a business (either for profit or nonprofit) with less than 50 full-time employees and a small city is defined as a city with less than ten full-time employees.

During the first year after the proposed changes go into effect, will it cost more than \$25,000 for any small business or small city of comply with the change? ☐ Yes ☒ No If yes, identify by name the small business(es or small city(ies).

Will this proposed plumbing code amendment require any local government to adopt or amend an ordinance or other regulation in order to comply with the proposed plumbing code amendment? ☐ Yes ☒ No, If yes, identify by name the government(s) and ordinances(s) that will need to be amended in order to comply with the proposed plumbing code amendment.

Additional supporting documentation may also be attached to this form. Are there any additional comments you feel the Committee/Board may need to consider? If so, please state them here:

Information regarding submitting this form:

- Submissions are received and heard by the Committee on an "as received" basis. **Any missing documentation will delay the process, and your proposal will be listed as the date it was received "Complete."**
- **Submit any supporting documentation to be considered**, such as manufacturer's literature, approvals by other states, and engineering data electronically to DLI.CCLDBOARDS@state.mn.us. Once your Request For Action form has been received, it will be assigned a file number. Please reference this file number on any correspondence and supplemental submissions.
- For copyrighted materials that must be purchased from publishers, such as published standards, product approvals or testing data, listings by agencies (IAPMO, ASSE, ASTM, etc.) you may send (or email) two copies, *along with written permission from the publisher to distribute the materials at meetings*, via U.S. Mail to: Plumbing Board, c/o Department of Labor and Industry, 443 Lafayette Road No., St. Paul, MN 55155-4344.
- For materials that must be submitted by U.S. Mail, please include a copy of your "Request For Action" form originally submitted and reference your assigned RFA file number.

Information for presentation to the Committee and/or Board:

- Limit presentations to 5 minutes or less.
- Be prepared to answer questions regarding the proposal and any documentation.

Information regarding Committee and/or Board function:

- The Plumbing Board or designated Committee.

I understand that any action is a recommendation to the Plumbing Board and is not to be considered final action.

NAME AND E-MAIL ADDRESS	FIRM NAME
Anita Anderson anita.c.anderson@state.mn.us	Minnesota Department of Health
NAME, PHONE NUMBER AND E-MAIL ADDRESS OF PRESENTER TO THE COMMITTEE (if different):	

ADDRESS	CITY	STAT E	ZIP CODE
11 E. Superior Street Suite 290	Duluth	MN	55802
PHONE	SIGNATURE (original or electronic)	DATE	
218-302-6143	Anita Anderson	2/25/2025	

For Assistance or questions on completing this form, contact Mike Westemeier, Department of Labor and Industry at michael.westemeier@state.mn.us or by phone 651-284-5898.

For Office/Committee Use Only Proposal received completed? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Date Proposer notified of gaps:	Mode of notification (e.g., e-mail)	Date returned to Proposer:	Date materials re-received: