

Plumbing Board  
c/o Department of Labor and Industry  
443 Lafayette Road North  
St. Paul, MN 55155-4344  
[www.dli.mn.gov](http://www.dli.mn.gov)  
Email: [DLI.cclboards@state.mn.us](mailto:DLI.cclboards@state.mn.us)

RFA PB0203.Jason Krueger.MN Concrete Pipe  
Section 1101.4.7 Storm Drainage - Received 6.2.2025

## Plumbing Board Request for Action

PRINT IN INK or TYPE

<b>NAME OF SUBMITTER</b>	<b>PURPOSE OF REQUEST</b> (check all that apply): <input type="checkbox"/> New Code
Jason Kruger	<input checked="" type="checkbox"/> Code Amendment <input type="checkbox"/> Repeal of an existing Rule
The Minnesota Plumbing Code (MN Rules, Chapter 4714) is available at <a href="https://epubs.iapmo.org/2020/MPC/">https://epubs.iapmo.org/2020/MPC/</a>	
<b>Specify the purpose of the proposal:</b> 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) Clarification of pipe to manhole connections in storm drainage applications.	
<b>Does your submission contain a Trade Secret?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes, mark “ <b>TRADE SECRET</b> ” 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.	
<b>Describe the proposed change.</b> The Minnesota Plumbing Code (Minnesota Rules Chapter 4714) is available here: <a href="https://epubs.iapmo.org/2020/MPC/">https://epubs.iapmo.org/2020/MPC/</a>	
<b>NOTE:</b> <ul style="list-style-type: none"><li>Please review the Minnesota Plumbing Code and include all parts of the Code that require revision to accomplish your purpose.</li><li>The proposed change, including suggested rule language, should be <i>specific</i>. If modifying existing rule language, <u>underline new words and strike through deleted words.</u></li></ul> Please list all areas of the Minnesota Plumbing Code that would be affected.	
<ul style="list-style-type: none"><li><b>4714.1101.4.7 Pipe Connections to Structures.</b> <u>Connections of concrete pipe to concrete storm drainage manholes, catch basins, area drains and other similar structures may be made using a mortar joint, except where testing is required in accordance with Section 4714.1107.1. In such cases a watertight, resilient joint connection is required. All connections of PE, PVC and Vitrified Clay pipe to storm drainage manholes, catch basins, area drains and other similar structures, as designated by the Engineer of Record, shall be made using resilient flexible joint connections.</u></li></ul>	
Definitions: <ul style="list-style-type: none"><li><u>215</u> <b>Mortar Joint.</b> <u>A connection created where a pipe penetrates a manhole or concrete structure wall by filling the annular space between the pipe and the wall with non-shrink grout or an approved mortar mixture consisting of cement, aggregates and water.</u></li></ul>	

<b>For Office/Committee Use Only</b> Proposal received complete? <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:
<b>Office Use Only</b>			
RFA File No. PB0203	Date Received by DLI 6/2/2025	Dated Received by Committee 6/4/2025	Date of Forwarded to Board
Title of RFA RFA PB0203.Jason Krueger.MN Concrete Pipe.Section 1101.4.7 Storm Drainage - Rec'd 6.2.2025			
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	
<p><b>Need and Reasons For the Change.</b> 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.</p> <p>The reason for the change is to clarify where resilient rubber joints are and are not required.</p> <ul style="list-style-type: none"> <li>In most storm drainage applications, the concrete structures used for manholes and catch basins fall within the exceptions for testing as stated in <i>1107.2 (3) Testing Exceptions (3): Portions of storm drainage system and sewers that are located more than ten feet from buildings, more than ten feet from buried water lines, and more than 50 feet from water wells, and do not pass through soil or water identified as being contaminated are exempt from testing.</i> Therefore, storm drainage structures should not be required to have watertight resilient rubber joints when testing is not required.</li> <li>Mortar is commonly used to fill the annular space around the pipe when it is connected to a manhole or structure for storm drainage applications and should be stated separately of the sanitary drainage specification for manholes.</li> </ul>			
<p>If your product/method standard(s) is not currently listed in a national code, 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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>ASTM C270 is the relevant standard for mortar used in below-grade applications and can be added to the appendix where other standards are listed.</li> </ul>			
Please attach electronic scanned copies of any literature, standards and product approvals or listings. Printed or copyrighted materials, <b>along with written permission from the publisher to distribute the materials at meetings</b> , and email to <a href="mailto:DLI.cclboards@state.mn.us">DLI.cclboards@state.mn.us</a>			
<b>Primary reason for change:</b> (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 checked="" type="checkbox"/> Provide uniform application		
<input type="checkbox"/> Encourage new methods and materials	<input type="checkbox"/> Clarify provisions		
<input type="checkbox"/> Change made at national level	<input type="checkbox"/> Situation unique to Minnesota		
<input type="checkbox"/> Other (describe)			
<b>Anticipated benefits:</b> (check all that apply)			
<input type="checkbox"/> Save lives/reduce injuries	<input checked="" type="checkbox"/> Provide more affordable construction		

<input checked="" type="checkbox"/> Improve uniform application	<input type="checkbox"/> Provide building property
<input type="checkbox"/> Improve health of indoor environment	<input type="checkbox"/> 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)

  

**The Following Information is Optional. This Information can Assist in Evaluating a Request for Action and in Rulemaking and Should be Provided if Known.**

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

1. Does the proposed change increase or decrease the cost of enforcement?    ☒ Yes    ☐ No    If yes, explain  
 Enforcement cost would be decreased due to more common install practices for storm drainage.

2. Does the proposed change increase or decrease the cost of compliance?    ☒ Yes    ☐ No    If yes, explain  
 Include the estimated cost increase or decrease, and who will bear the cost increase or experience the cost decrease:  
 Because the contractors installing the storm drainage items are more familiar with mortar joints it could result in a decrease of the cost of compliance.

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

4. Were alternative methods considered?    ☐ Yes    ☒ No    If no, why not?    If yes, explain what alternative methods were considered and why they were rejected.  
 With the mortar joint option being the one that is commonly used and the cheapest alternative for storm drainage install there were no other alternatives reviewed.

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. This change would benefit the storm drainage installation contractor.

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

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

Are there any differences between the proposed change and existing federal regulations?    ☐ Yes    ☐ No  
☒ 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](mailto: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.**

Submitter's Name	Submitter's Email Address	Submitter's Firm Name	
Jason Kruger	jkruger@jskrugerconsulting.com	Minnesota Concrete Pipe Association	
Presenter's name, phone, and email if different			
Submitter's Mailing Street Address	City	State	Zip Code
3540 Dupont Ave. S	Minneapolis	MN	55408
Submitter's Phone	Submitter's Signature (original, electronic or typed)	Date	
612-867-2037	Jason Kruger	5/30/25	

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