

Meeting Minutes: 2024 UPC ad hoc Rulemaking Committee of the Plumbing Board

Date: Dec. 4, 2024
Time: 9:00 a.m.
Minutes by: Lyndy Logan
Location: DLI, 443 Lafayette Rd. No., St. Paul, MN 55155

Committee Members

1. Karl Abrahamson (Committee Secretary)
2. Richard Becker (Chair)
3. Justin Parizek
4. Mike Westemeier (DLI CO's Designee)

Committee Members Absent

None

DLI Staff & Visitors

Adam Case (Board Counsel, DLI) – WebEx
Lyndy Logan (DLI)
Brad Jensen (DLI)
Tom Eisert (DLI) – WebEx
Hannah Mardaus (DLI) – WebEx
Steve Neubel (DLI)
Chris Rosival (DLI) – WebEx

DLI Staff & Visitors continued...

Lew Anderson (City of Mpls) – WebEx
Tad Asay (Schier Products)
Jason Bethke (City of Blaine)
Scott Eggen (City of Minneapolis)
Jeff Hill (MWQA)
Mike Johnson (J-Berd Mech)
Gonzalo Lagos (Schier Products) – WebEx
Mark Mayer (Bongard Corp.)
Pete Moreau (Adspipe) – WebEx
David Nickelson (Uponor) – WebEx
Bradley Peterson (City of Rochester)
Jim Peterson (MN PHCC)
Jarrett Purdue – WebEx
David Radziej (MN PHCC)
Gary Thaden (MMCA/NECA) – WebEx
Eric Thompson (Schier Products)
Chad Whiting (U of M) – WebEx

1. **Call to Order**

- A. Committee Chair Becker called the meeting to order at 9:03 a.m. Committee Secretary Abrahamson took a roll call, and a quorum was declared with 4 of 4 Committee members present in person.
- B. Announcements/Introductions
 - Everyone present in person and remotely can hear all discussions.
 - All votes will be taken by roll call if any member is attending remotely.
 - All handouts discussed and WebEx instructions are posted on the Committee's website.

2. **Approval of meeting agenda**

A motion was made by Westemeier, seconded by Parizek, to approve the agenda as presented. The vote was unanimous with 4 votes in favor; the motion carried.

3. **Approval of previous meeting minutes**

A motion was made by Westemeier, seconded by Parizek, to approve the Nov. 6, 2024, minutes with the addition of Stephanie Menning (MUCA) under visitors. The vote was unanimous with 4 votes in favor; the motion carried.

4. **Regular Business**

No expense reports.

5. Special Business

[Review and discuss the outstanding RFA numbers](#) PB0165, PB0170, PB0171, and PB0173, along with tabled items 603.5.18, 603.5.18.1, 605.1.3, 605.7.1.1, 609.8.3, and 719.6. If time permits, the Committee will also review appendices and related items, and schedule meeting dates to review and discuss outstanding RFA numbers PB0161, PB0166, PB0167, PB0169, PB0174, PB0176, PB0178, PB0179, PB0184, PB0185, and PB0186, as well as tabled items. Additionally, the Committee may discuss potential rulemaking recommendations for the Plumbing Board.

A. [RFA PB0165](#) – Lew Anderson (Section 311.1) – Rec'd 2/5/2024

- **Dec. 4, 2024 – The Committee accepted the proposal as follows:** Every building shall have its own independent water and sewer connection except that a group of buildings may be connected to one or more sewer manholes on the premises that are constructed to standards set by the Authority Having Jurisdiction. Water and sewer piping shall not be routed below or through one townhouse to serve another townhouse, as defined in the Minnesota Residential Code as a single-family dwelling unit constructed in a group of two or more attached units in which each unit extends from the foundation to the roof and having open space on at least two sides of each unit. Each single-family dwelling unit shall be considered to be a separate building. Separate building service utilities shall be provided to each single-family dwelling unit when required by other chapters of the State Building Code.

B. [RFA PB0170](#) – Eric Thompson (Chapter 10, Section 1014.2) – Rec'd 5/16/2024

- Eric Thompson, Regulatory Compliance Manager, and Tad Asay, Manager of the Design Engineering Department, both of Schier Products introduced themselves and summarized RFA PB0170. Due to connection requirements, Schier Products has encountered issues with Type D grease interceptor units and submitted this RFA. The Minnesota Plumbing Code requires direct connections per 704.3, impacting interceptors tested under ASME A112.14.3 standards. Schier's tests compared directly and indirectly connected systems, showing that directly connected interceptors perform better. Despite the code, indirectly connected interceptors should not be excluded because they also meet performance standards. They request approval for Type D units and a code amendment for future cycles. Thousands of interceptors, both directly and indirectly connected, have performed effectively. The engineering design should focus on flow rate, not connection type, as both perform effectively. Schier asks the Committee to consider their findings and approve the use of Type D units in directly connected systems. The point is does the flow rate meet the specifications for the grease interceptor to be installed? The flow rate is the important part, not whether it is directly or indirectly connected. This has been proven in their study, and whether directly or indirectly connected, it is still the same flow rate.
- The committee explained direct connection policy in Minnesota is based on recommendations from the Minnesota Department of Health and that the UPC mandates direct connections. The proposal requests that Type D units be listed as approved but connected directly, although that is not the standard. The committee asked if testing involved a third-party verifier and if there were test reports.
- Eric Thompson explained they have had third-party testing for Type C since 2006 and for Type D since 2019 with approvals from IAPMO and that although Type D is indirectly connected per the standard real-world application often involves a mix or direct connections.
- Committee asked: standard indicates it was tested for direct connections? Thompson explained that yes Type D was tested directly and IAPMO witnessed the test. Interceptors are tested at 200 GPM, and anyone is welcome to visit the Kansas City facility.
- Asked to explain the difference between Type C and Type D performance, Thompson explained that Type C interceptors use a cartridge on the inlet side, acting like a dam to control flow rate. Tad Asay explained that, unlike Type C, Type D does not have internal flow control, it was designed to eliminate internal barriers to improve efficiencies. Type D has been tested up to

200 GPM, showing it performs well without internal flow controls, demonstrating high levels of grease trapping efficiency, as verified by third-party tests.

- Becker expressed hesitancy to go against the standard which is meant to ensure consistency. Even though the product performs well, allowing Type D could introduce issues with products that don't meet the same standards. If there are problems and they say it is ok there could be complications.
- Thompson explained the standard exists and while they were the first to test it another manufacturer now offers Type D units. High-capacity, high-efficiency hydro mechanical grease interceptors aren't fully addressed by the code, for example, the GB50 holds far more grease than required by the code. Type D was also certified at 75 GPM, offering flexibility in flow rates. The focus should be on adhering to the standard rather than the connection type.
- Thompson was asked if the Type C standard specifically requires internal flow control and answered yes. Thompson explained the issue with telltale floor drains is likely due to the flow control in the grease interceptor causing backups if not rated properly which can create health concerns. Type D helps with this by keeping grease where it belongs.
- Westemeier discussed products needing to be installed as they are listed. If other products don't meet the same standard this could lead to problems.
- Thompson explained that testing their interceptors to the Type C standards would be a step backward and that with test reports and data maybe specific Type D units could be allowed without approving all Type D units. A lot went into meeting this standard. If units have third-party IAPMO certifications they should be valid regardless of connection type.
- Becker noted that they cannot create language that approves one product but not others and that standards should dictate installation. Becker asked if the standard could be updated to include both direct and indirect connections.
- Thompson stated the ASME committee has discussed this. Most jurisdictions require a floor sink, which is why Type D exists. Since Minnesota has a unique code, they are requesting a unique solution for Type D. Individual units could be certified, as done in Wisconsin where specific products are approved, which is not done in Minnesota.
- The committee noted the board intentionally does not approve specific products. Abrahamson noted that the board has maintained unless approved by the UPC or IPC the board will not consider it. Standards are approved, not products. Abrahamson noted the data is great, but third-party verification is needed. Approval could be sought through specific jurisdictions in specific instances.
- Thompson noted that under the code listed grease interceptors with internal flow controls should be installed per the manufacturer's instructions. Because Type D has restricting devices, does this exception apply?
- Becker noted that interpretation is for the full board. The code doesn't explicitly prohibit Type D, but compliance with the code is required. Westemeier stated that installation instructions matter, including where the instructions show only indirect connections.
- Thompson noted that while the standards call for indirect connections, in the real world both are used.
- Abrahamson stated there is a path to get Type D units approved in Minnesota, but the standard listing must include direct connections. Standards are improved, not products. Becker stated the standard should be followed. The data supports the product, but standards are specific for a reason. Becker recommends keeping the existing language in the 2020 Minnesota Plumbing Code.
- Thompson noted there are now two manufacturers of this technology and they aim to align with the code and use the best available technology and will continue to seek approval.
- **Dec. 4, 2024 – The Committee did not accept RFA PB0170. The Committee recommends keeping the language in the current Minnesota Plumbing Code.**

- C. [RFA PB0171](#) – Jim Peterson (Chapter 4) – Rec’d 6/25/2024
- **Dec. 4, 2024 – The Committee did not accept RFA PB0171.** Peterson noted that if the language remains in the Minnesota Plumbing Code then Appendix I should be reviewed. Westemeier said he would discuss this further with CCLD’s Licensing unit.
- D. [RFA PB0173](#) – Scott Thompson (Chapter 6, Section 609.10) – Rec’d 6/27/2024
- The committee reviewed RFI PB0157 which stated water hammer arrestors are not required unless water hammering has been identified. The RFI noted that the code was not intended to require water hammer arrestors in all installations
 - **Dec. 4, 2024 – The Committee did not accept RFA PB0173 and recommends keeping the language section 609.10 language from the current Minnesota Plumbing Code.**
- E. Tabled items 603.5.18, 603.5.18.1, 605.1.3, 605.7.1.1, 609.8.3, and 719.6
- **603.5.18 – Pure Water Process Systems**
 - The Committee reviewed [RFI PB0152](#). Keep as shown in the 2024 UPC.
 - **603.5.18.1 – Dialysis Water Systems**
 - Keep as shown in the 2024 UPC with the following revision: **603.5.18.1 Dialysis and other non-potable Water Systems.** The individual connections of the non-potable dialysis related equipment to the dialysis pure water system shall not require additional backflow protection.
 - **605.1.3 – Mechanical Joints**
 - Keep as shown in the 2024 UPC.
 - **605.7.1.1 – Compression Joints**
 - Keep as shown in the 2024 UPC.
 - **609.8.3 – Hot-Water Recirculating Pumps**
 - Delete in its entirety from the 2024 UPC.
 - **719.6 – Manholes**
 - **Item was tabled. Jensen will submit an RFA.**
- F. Schedule outstanding RFA numbers PB0161, PB0166, PB0167, PB0169, PB0174, PB0176, PB0178, PB0179, PB0184, PB0185, and PB0186.
- [RFA PB0161](#) – Karl Abrahamson (Chapter 3) – Revised rec’d 6/18/2024
 - **Dec. 4, 2024: Tabled until a later date**
 - June 18, 2024: Abrahamson re-submitted his RFA – will review at a later date
 - [RFA PB0166](#) – Lowry Engineering (Chapter 11) – Rec’d 3/1/2024
 - **Dec. 4, 2024: Will discuss at the January meeting**
 - Oct. 3, 2024: Waiting on information from IAPMO
 - [RFA PB0167](#) – Kyle Dimler (Section 310.5) – Rec’d 3/6/2024
 - **Dec. 4, 2024: Will discuss at the January meeting**
 - [RFA PB0169](#) – Daniel Currence (Table 702.3, Table 1102.4) – Rec’d 4/17/2024
 - **Dec. 4, 2024: Will discuss at the January meeting**
 - [RFA PB0174](#) – Minnesota Concrete Pipe Association (Chapter 11) – Rec’d 8/5/2024
 - **Dec. 4, 2024: Will discuss at the January meeting**
 - [RFA PB0176](#) – City of St. Paul (Appendix M) – Rec’d 8/16/2024
 - **Dec. 4, 2024: Will discuss at the January meeting**
 - Nov. 6, 2024: The submitter requested their RFA be heard at the January meeting.

- [RFA PB0178](#) – Jarrett Purdue (Chapter 11) – Rec’d 9/4/2024
 - Dec. 4, 2024: Will discuss at the January meeting
- [RFA PB0179](#) – Brad Harrison, Ferguson Waterworks (Chapter 7) – Rec’d 9/30/2024
 - Dec. 4, 2024: Will discuss at the January meeting *if time allows*

The tabled items below will be scheduled at a later date:

- [RFA PB0168](#) – Jeffrey Hill (Section 611.0) – Chapter 6 – Revised at 11/6/2024 meeting
 - Dec. 4, 2024: Will schedule at a later date
 - Table 611.4 – accept as presented except the Notes – these were tabled until appendices can be reviewed
 - [611.6](#) Isolation and By-pass – tabled until a later date
- [RFA PB0181](#) – Lew Anderson, City of Mpls (Chapter 8) – Rec’d 10/3/2024
 - Dec. 4, 2024: Will schedule at a later date
 - The RFA was tabled until Westemeier can provide input from the Mechanical Code TAG
- [RFA PB0182](#) – Lew Anderson, City of Mpls (Chapter 6, Section 601.3.3) – Rec’d 10/3/2024
 - Dec. 4, 2024: Will schedule at a later date
 - RFA was tabled until ASME 13.1 can be reviewed. Abrahamson will reach out to IAPMO.
- [RFA PB0184](#) – Jim Peterson (Chapter 10) – Rec’d 11/4/2024
 - Dec. 4, 2024: Will schedule at a later date
- [RFA PB0185](#) – Tom De Genaro (Table 710.2) – Rec’d 11/25/2024
 - Dec. 4, 2024: Will schedule at a later date
- [RFA PB0186](#) – Karl Abrahamson (Chapter 4) – Rec’d 12/3/2024
 - Dec. 4, 2024: Will schedule at a later date

At the next meeting, [review and discuss the outstanding RFA numbers](#) PB0166, PB0167, PB0169, PB0174, PB0176, PB0178, and if time permits, PB0179, along with appendices and related items. Schedule meeting dates to address RFA numbers PB0168, PB0181, PB0182, PB0184, PB0185, PB0186, and tabled items. Additionally, the Committee may discuss potential rulemaking recommendations for the Plumbing Board.

6. Announcements

The following Committee meetings have been scheduled and notices will be sent to the Plumbing Board’s interested parties distribution list one week prior. Meetings will be in person at DLI with WebEx and phone options. Meetings begin at 9 a.m. and are expected to last 2-3 hours.

- **Thursday**, January 2, 2025
- Wednesday, February 5, 2025
- Wednesday, March 5, 2025
- Wednesday, April 2, 2025
- Wednesday, May 7, 2025
- **Tuesday**, June 10, 2025
- Wednesday, July 2, 2025

7. Adjournment

A motion was made by Abrahamson, seconded by Parizek, to adjourn the meeting at 11:27 a.m. The vote was unanimous with 4 votes in favor of the motion; the motion passed.

Respectfully submitted,

Karl Abrahamson

Karl Abrahamson, Committee Secretary

Green meeting practices

The State of Minnesota is committed to minimizing in-person environmental impacts by following green meeting practices. DLI is minimizing the environmental impact of its events by following green meeting practices. DLI encourages you to use electronic copies of handouts or to print them on 100% post-consumer processed chlorine-free paper, double-sided.

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