

## ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES (This form must be submitted electronically)

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### **Proposed Code Change - Language**

~~**Vent pipe identification.** All radon vent pipes shall be identified with at least one label affixed to the vent pipe that is visible on in each floor story and in accessible attics. The label shall read: "Radon Reduction System Vent Pipe."~~

**Vent pipe identification.** All exposed radon vent pipes shall be identified with at least one label on each floor and in attics when the attic is designated as the future fan location. The label shall read: "Radon Reduction System."

### **Proposed Code Change – Need and Reason**

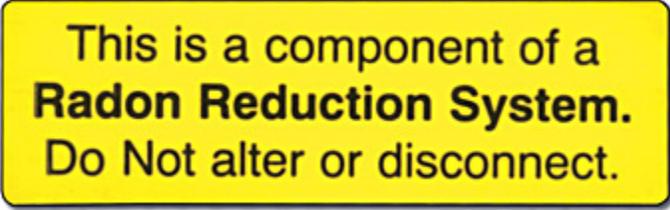
This revision is necessary because the draft language provides erroneous direction and changing the wording on the language conflicts with readily available pre-printed labels.

The draft rule can be interpreted to mean that there must be an opening in a wall on each floor so that the vent pipe is visible and that there be a label affixed at that location. That is unreasonable but it will get enforced that way by some code officials.

My proposal also deletes the requirement for labeling the vent pipe in an attic unless the attic is the dedicated location for a future fan. The proposed draft requires the vent pipe be labeled in "accessible attics". Nearly all attics will have an access panel but the vent pipe may be far from the access panel and labeling the vent serves no purpose.

The draft rule also changes the text of the required label. Preprinted labels are readily available that are based on the model code language. By changing the wording on the label, a special rule is created for Minnesota that will result in special labels needing to be printed at additional cost. For contractors that have purchased labels, they have the potential for those existing to be rejected.

The proposal is reasonable because it simplifies the language, eliminates a cost increasing label change, and only requires labels where the vent is visible.



**Proposed Code Change – Cost/Benefit Analysis**

This proposal will reduce the cost of construction.

## 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).

Radon rules

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.

No

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.

No

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

Code officials, building designers, contractors, building owners

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.

No