

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

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**Proposed Code Change - Language**

**~~REQUIREMENTS FOR ACTIVE DEPRESSURIZATION SYSTEMS~~**

~~**Active systems.** When an active depressurization systems is installed, all the requirements for the passive depressurization system shall be met. In addition, an active depressurization system shall incorporate the following:~~

- ~~1. A Radon vent pipe fan with a minimum cfm measurement of 50 cfm @ ½ inch w.g. shall be installed in the vertical vent pipe. If the fan is installed on the interior side of inside the building envelope, the vent pipe on the discharge side of the fan shall be independently pressure tested at 5 psi for 15 minutes to ensure there are the vent pipe contains there are no leaks in the pipe in the vent pipe itself.~~
- ~~2. A system monitoring device such as but not limited to, an audible alarm or a manometer, shall be installed. To indicate when the fan is not operating. (the device many need a better description the ALJ will not understand this... maybe "such as...")~~

**Proposed Code Change – Need and Reason**

This proposal is necessary because the draft rule regulating active systems goes beyond the statutory requirement that only passive systems be installed. The statute requires that the model code language in the IRC be used as a basis. That language only regulates passive systems.

Failure to delete this section would result in regulations for a non-required system.

If a homeowner should install a vent pipe fan but not install a monitoring device, one solution to a correction notice from a field inspector is to remove the fan.

If a homeowner tests the pipe and it fails to hold the pressure test, one solution is to remove the fan.

The draft rule can be misinterpreted to apply to any existing home that undergoes installation of a vent pipe fan.

When a vent pipe is pressure tested, the roof top test cap must be removed. Will someone other than a plumber know that they need to go onto the roof to remove it? In retrofit situations, will a homeowner be willing to go on their roof to install a test cap?

The proposal would require additional permitting from building departments because the rule would apply if a home that has a required passive system undergoes conversion to an active system at some time after a CO is issued or, conceivably, if a decision is made to convert a system after the initial vent pipe installation is inspected. It only makes sense that the rule would apply to installations occurring after a CO is issued because if it is important that these systems be inspected to a certain standard at initial construction, the same logic would apply to later retrofits. If we don't care about the system in a year old home, why would we care about an installation in a brand new home.

Radon vent pipes are not plumbing. Although some radon vent pipes are installed by plumbers, others can be installed by a mechanical contractor or by an untrained employee, both of whom may lack the skills and equipment to glue and prime plastic pipe and to conduct a pressure test. It can even be interpreted to mean that the field inspector will conduct the pressure test which could be presumed by a homeowner or other person unfamiliar with test protocol.

It would also require potential additional inspections that will result in an increase in permit fees because the vent pipe pressure test may occur at a time that is not coincidental with other similar inspections.

It is reasonable to delete this language because regulating work that is not required is inappropriate, costly, and overly restrictive.

### **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).

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).  
Radon rules

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