

# Plumbing Board

c/o Department of Labor and Industry

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## NOTICE OF FINAL INTERPRETATION

On April 21, 2026, the Minnesota Plumbing Board issued a Final Interpretation, which is printed below, pursuant to Minnesota Statutes §§ 326B.435, subd. 2(a)(4), and 326B.127, subd. 5.

Any person aggrieved by this Final Interpretation may appeal it within thirty (30) days of its issuance in accordance with Minnesota Statutes Chapter 14. Minnesota Statutes § 326B.127, subd. 5.

Questions may be directed to Ken McGurran, telephone number: 651-284-5164, email:

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## FINAL INTERPRETATION

Inquiry:	PB0229
Subject:	Storage Overflows
Code Reference:	Minnesota Plumbing Code: 2018 Uniform Plumbing Code (UPC) sections 206 and 218, as modified by Minnesota Rules, parts 4714.0206 and 4714.0218.
Submitted by:	David Weum, on behalf of the Minnesota Department of Health, 625 Robert St. N, Saint Paul, MN, 55155
Approved by:	Minnesota Plumbing Board, by Karl Abrahamson, Chair
Date Received:	March 24, 2026
Issue Date:	April 21, 2026
Publication Date:	May 5, 2026

**Question:** Are the overflow pipes of a municipal drinking water system’s water storage tanks considered “drainage systems” within the meaning of Minn. R. 4714.0206 and/or “plumbing systems” within the meaning of Minn. R. 4714.0218?

**Answer:** No. The overflow piping of a municipal drinking water system’s water storage tanks cannot be considered a “plumbing system” or “drainage system” until such piping discharges through an air gap into a plumbing fixture or drain.

**Analysis:** In relevant part, section 206 of the 2018 UPC, as modified by Minnesota Rules, part 4714.0206, provides as follows:

- **Drainage System** - Includes all the piping within public or private premises that conveys sewage, rainwater, or other liquid wastes to a legal point of disposal, but does not include the mains of a public sewer system or a public sewage treatment or disposal plant.

In relevant part, section 218 of the 2018 UPC, as modified by Minnesota Rules, part 4714.0218, provides as follows:

- **Plumbing System** - Includes all potable water, building supply, and distribution pipes; all plumbing fixtures and traps; all drainage and vent pipes; and all building drains and building sewers, including their respective joints and connections, devices, receptors, and appurtenances within the property lines of the premises and shall include potable water piping, potable water treating or using equipment, and nonpotable water piping serving plumbing fixtures.


At the outset of its analysis, the Board observed that this request for interpretation is complex because it potentially implicates many sections of the Minnesota Plumbing Code as well as the Minnesota Department of Health’s statutory authority to regulate public water supplies and water treatment. Relatedly, the Board observed that the Department of Labor and Industry typically avoids attempting regulation inside of water treatment facilities and instead has determined that overflow piping may be plumbing once outside of the water treatment process.

The submitter asserted that overflow piping for a municipal drinking water system’s water storage tanks is “process/safety” piping, which serves a different purpose than drainage piping. The submitter also asserted that such overflow piping only becomes part of the plumbing system once it discharges through an air gap into a plumbing fixture or drain. The Board concurred with both assertions. Therefore, the Board determined that overflow piping of a municipal drinking water system’s water storage tanks is not a “plumbing system” within the meaning of Minnesota Rules, part 4714.0218, and would not qualify as a plumbing system until after the overflow piping discharge through an air gap into a drain or other location. The Board then concluded that because such overflowing piping was not necessarily a “plumbing system”, it would likewise not qualify as a “drainage system” within the meaning of Minnesota Rules, part 4714.0206, based on the logic that a “drainage system” is a category subsumed within the broader definition of “plumbing system.”

**Commentary:** This request for interpretation was submitted on or about March 24, 2026. On April 15, following email correspondence between the submitter and the Board’s counsel, the submitter agreed to revise the original request for interpretation by specifying that it sought an interpretation of only two code sections: 2018 Uniform Plumbing Code (UPC) sections 206 and 218, as modified by Minnesota Rules, parts 4714.0206 and

4714.0218. The Board considered this request for interpretation at the special meeting of the Board on April 21. All parties had an opportunity to be heard. As required by Minnesota Statutes, § 326B.127, subd. 5, the Minnesota Plumbing Board considered this final interpretation for adoption as part of the Minnesota Plumbing Code, and it did so at the special meeting of the Board on April 21.

**Date: May 5, 2026**



Karl Abrahamson, Chair

Minnesota Plumbing Board