

Plumbing Board
Department of Labor and Industry

Board Meeting Open Forum Request

Please keep your presentation to 5 minutes or less.

- Please send this form, and any related materials/presentations to Lyndy Logan at **least 1 day prior to the start of the WebEx meeting.**
- Availability based on length of meeting and number of requestors.

Plumbing Board Special In-Person Plumbing Board Mtg		Date of Meeting 11-17-25		Will you be attending meeting in person or by phone? In-person	
Name Jeff Hill		Street/Mailing Address 5861 Creek Valley Rd			Phone Number 952-529-2576
City Minneapolis	State MN	Zip 55439	Email Address jeffreyboydhill@outlook.com		
Representing/Company Name Minnesota Water Quality Association					
Topic: Agenda Item 5. B. Special Business, Chapter 6 Recommendations, Minnesota Plumbing Code, section 611.6, water conditioning bypass systems					

- Send this form and related materials to Lyndy at: lyndy.logan@state.mn.us
- For meeting information, including Open Forum Request forms, please visit the Plumbing Board's web-page at: <https://www.dli.mn.gov/about-department/boards-and-councils/plumbing-board>

Elias Naatz – Minnetonka -----

1. How will this impact your business with regard to cost?
 - I. Our business will have increased costs with a bypass requirement. This will come from our own technicians' labor, and parts to add a bypass outside of our integrated bypasses.
 - II. An additional cost will put our business in a situation of passing the costs onto the customer, possibly deterring new customers due to higher pricing than a DIY system.
2. Is it going to add to your install time? Give a brief explanation.
 - I. This will add installation time to our installs. We would be looking at a minimum of 30min – 1 hr of additional install time. Time is precious in the home; our goal is to inconvenience the customer as less as possible. This new law would require us more time in a home when customers are working from home and hoping we can be in and out quickly.
3. What, if any, is the benefit to the consumer? To businesses? To public health?
 - I. This would allow a customer to shut off water at their home for any situation and not require a call to the city.
After many years, I could see a benefit to swapping out a system from a competitor's system. Installation costs and time would go down.
4. Do you see an advantage to the bypass requirement? Disadvantages?
 - I. Overall, I see a disadvantage to the bypass requirement. I fear the extra costs for businesses installing water softeners (both water conditioning and plumbing companies) would push consumers to purchase water softeners from big box stores. These softeners would be installed by DIY consumers, and I fear they won't know how to properly set their salt levels, sending more salt down the drain.

Thank you,

Elias Naatz
Project Manager

CulliganWater.com
Elias.Naatz@CulliganWater.com

Curtis Chaska – Red Wing -----

1. How will this impact your business with regard to cost?
2. Is it going to add to your install time? Give a brief explanation.
3. What, if any, is the benefit to the consumer? To businesses? To public health?
4. Do you see an advantage to the bypass requirement? Disadvantages?

1. All of our equipment, along with most other units, already has a simple to use bypass included. It would also significantly increase cost to the customer. With already rising prices I have noticed that people are already less interested in investing in water treatment equipment.
2. As far as install time, my biggest concern is retrofitting to some homes would require major plumbing changes as space can be a significant issue with a lot of installs.
3. As for benefit to the customer I don't see much. In homes already equipped with 3 valve bypass I have seen homeowners that see those valves and open all 3, letting hard water flow to service and bypassing treatment. Our bypasses are clearly labeled and simpler to operate, in my opinion, for the average homeowner.
4. For the average install I do not see the advantage of this requirement. Only in some instances where our bypass is not easily accessible is a 3-valve bypass needed, which if needed we would already install one regardless.

Our goal is to make water treatment as inexpensive and simple as possible for our customers. In my opinion adding increased cost/labor and extra valves to system would not help. Thank you for taking the time to listen!

Curtis Chaska

Culligan Water of Red Wing

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Jon Haferman – Burnsville -----

Here are some of the thoughts from our team.

1. The cost of copper materials alone is higher than the cost of our integral bypass without even including the cost of labor for assembly. The cost of copper is likely to increase with tariffs. All this additional cost will have to be passed to the consumer with little, if any, benefit.
2. Yes, assembling the bypasses either ahead of time in the shop or on-site will increase installation time because of sweating and/or pressing additional fittings and additional time planning.
3. There is no benefit to the consumer. There is no benefit to our water conditioning business. There is no benefit to public health since a bypass is already a requirement. This certainly benefits plumbers just like the old dishwasher air gap requirement (let's charge the consumer more without any additional benefit).
4. There are no real advantages, and it is illogical to require a bypass for water softeners and not for water heaters. I can only imagine the variety of bypass styles, materials, and installation locations that we will encounter if this becomes effective. The cost and complexity alone should be reason enough to abandon the idea.



Jon Haferman
Haferman Water Conditioning | Vice President
Service: 952.894.4040

Bret Tangley – Sauk Centre -----

On behalf of our location, I wish to express my strong opposition to this proposal below for an ADDITIONAL 3-valve bypass installation on water treatment equipment. Our industry has a long standing reputation of performing quality work with a Minnesota restricted plumbing license that includes the inclusion of bypasses to isolate the equipment solution from providing the building with continuous water.

The additional bypass configuration below does not add meaningful enhancement to the experience for the end user and in fact it adds considerable costs in labor and materials to the end user resulting in higher prices being charged the citizens of MN.

We strongly oppose this proposal and wish to support MWQA in any fashion possible to halt its advancement in the MN plumbing code or legislative landscape. Please let me know if or how we can help.

Respectfully submitted,

Bret P. Tangley, MWS | President & CEO | Restricted Master Plumber/WC Master
Sterling Water – Minnesota, LLC | 625 Lincoln Loop, Sauk Centre, MN 56378
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Ed Larson – Rothschild WI -----

1. How will this impact your business with regard to cost?
My cost would be around \$55 for parts, not adding labor.
2. Is it going to add to your install time? Give a brief explanation.
I would have to estimate ½ hour of extra labor to build bypass. Installation of 3 valves, pipe, and sizing with leveling.
3. What, if any, is the benefit to the consumer? To businesses? To public health?
There is no benefit to the residential customer, as all water treatment equipment has a bypass already on the unit.
4. Do you see an advantage to the bypass requirement? Disadvantages?
The only advantage would be a secondary bypass. Disadvantage is this would add \$150 min onto the customer's expense with little to no purpose.

Ed Larson | Service Manager
Master Restricted Plumbing Appliance
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Tim Gens – Brainard/Baxter -----

1. How will this impact your business with regard to cost?

Answer: A substantial increase to installation cost and billings

2. Is it going to add to your install time? Give a brief explanation.

Answer: It will add at least 30 minutes to the installation, granted we could do a prebuild in the warehouse but again more cost to the dealership and we will need to pass this on to the customer.

3. What, if any, is the benefit to the consumer? To businesses? To public health?

Answer: We offer a full bypass on every unit that goes out, so I see no value to the consumer. Commercial installs already get a 3 valve in most cases.

4. Do you see an advantage to the bypass requirement? Disadvantages?

Answer: I see no advantage to this and just more expense to the consumer. Labor and fittings will make this a spendy venture for everyone involved.

Tim Gens

General Manager-Baxter

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Culligan.



Eric Bartsh - Winona -----

Here is my opinion on the 3 - valve bypass being added to the plumbing code. This seems like a very unnecessary addition to the 2026 plumbing code that will have a negative effect on the consumer.

1. How will this impact your business with regard to cost?

This will significantly impact our installation pricing—a cost that we will need to pass on to our customers. I estimate that in our market, 90% of installations would require a new three-valve bypass. These valves are expensive, and in most cases, their addition would double or even triple our material costs.

2. Is it going to add to your install time? Give a brief explanation.

Adding a three-valve bypass would significantly increase our installation time. Currently, 90% of systems in the field do not have a three-valve bypass. In many cases, these systems are installed in small utility rooms or closets with limited space to accommodate a three-valve system. As a result, additional work would be required to ensure there is enough room for the bypass and that homeowners or businesses can operate it properly.

3. What, if any, is the benefit to the consumer? To businesses? To public health?

This could make future installations easier, but that alone seems like a small benefit compared to the additional cost and time required to install these on every system. Since all systems are different and the available space is unpredictable, it could just as easily have the opposite effect—making the next installation even more challenging and costly for the customer or business.

4. Do you see an advantage to the bypass requirement? Disadvantages?

Almost all systems currently include their own bypass system, which is easy to operate. Additionally, three-valve bypasses can create dead ends in the plumbing, which may be detrimental. These dead ends can become a breeding ground for bacteria and iron buildup. While the three-valve system is a simple concept, it can still confuse customers, leading them to open or close the wrong valves—potentially defeating the purpose of the equipment and, in some cases, posing a risk to the customer.

This is not beneficial for customers or businesses. Adding this requirement to the plumbing code will only increase material costs and labor time billed to the customer, with very little actual benefit.

Eric Bartsh
Culligan of Winona

Office - 507-452-3600
culliganbetterwater.com

Brent D Jones -- Winona -----

1-How will this impact your business with regard to cost?

All our units come from the factory with certified bypasses that are easy to use and are right on the unit connecting the system to the plumbing. Many times, valves cannot be located in a customer friendly location and customers cannot find the proper valve to shut. Cost will have to be passed on to the customer making business harder as now we will be forced to add material that is simply not needed, telling a customer we have to add this because of "code" never ends well, they tend to go to a box store and DIY it and we all know how that can end up.

2-Is it going to add to your install time? Give a brief explanation.

Absolutely! We will now have to cut more pipe out for previously installed equipment, and more than likely add pipe to install a non-needed item. If the current home plumbing does not allow for simple drop-down plumbing, now we will have to add pipe and fittings to arrange a place for it.

3-What, if any, is the benefit to the consumer? To businesses? To public health?

I see no benefit to either the homeowner or the business. The biggest downfall is the customer pays for something that is not needed and will never be used because they will use the unit bypass. We see quite often when the bypass valve gets opened, and the result is hard water, resulting in a cost to the Homeowner for a plumber or service company to make a needless service call. Dead ends on plumbing are never a good idea as it creates a perfect area to develop bacteria.

4 -Do you see an advantage to the bypass requirement? Disadvantages?

I see no advantage whatsoever by adding three needless valves to the home plumbing. The homeowner is not going to use them when there is a simple certified bypass on any professionally installed softener on the market today.

The disadvantages are many- needless plumbing for something that will most likely never be used even by the professional, extra piping, extra space needed for the plumbing, confusion to the customer on what to turn and not turn, the cost of added material and time for something that will never get used. There is no value as there is already one on the equipment that has been professionally installed.

Thank you

Brent D Jones
Service Manager
Winona, MN Culligan
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Todd Burkstrand - Ramsey -----

Here are my answers to your questions below:

1. Estimated retail cost for parts for the 3-way vales is approximately \$225. That cost would have to be passed on to the customer.
2. It will add about ¾ to 1 hour to add the bypass. This will depend on the piping configuration. Nothing seems to be standard from house to house.
3. I personally do not see any benefits; all of our systems have bypasses on them. It seems redundant.
4. I do see a need for 3-way bypass when installing a filter cartridge before the softener for ease of filter changes. As for softeners, it may add confusion to the customer on what valves to open or close or to use the bypass on the softener.

Hopefully this helps some.

Thanks, Todd

Todd Burkstrand

General Manager

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Kris Mielnik - Eau Claire -----

Below are my notes from the bypass town hall meeting/ responding to your questions.

1. How will this impact your business with regard to cost?
Additional costs adding: 3 shut off valves, tees, elbows, to an already high cost of plumbing parts when the integrated bypass does the same thing. If a tank or unit needs to be exchanged, the bypass still offers water out to service even if the system is not connected.
2. Is it going to add to your install time? Give a brief explanation.
Yes at least 30 minutes of additional installation time on the job, parts costs, which goes to the end user. Customers now have to decide what's important - good safe clean water or spending an arm and a leg for a simple installation when the water treatment device already has a bypass option.
3. What, if any, is the benefit to the consumer? To businesses? To public health?
Why do we need redundancy on a treatment system when the bypass is already on the system? Two bypasses is a complete waste for both the business and consumer. My only slight benefit would be the ability to pull a system out without shutting off the water. With that being said, if a different system is installed not all treatment systems have the same inlet/outlet/ set ups so the new treatment company will have to cut out that 3-way and put their own in, again costing that company and the end user more money for the same end goal.
4. Do you see an advantage to the bypass requirement? Disadvantages?
Only benefit on this in my field of work is isolating large commercial systems or replacement of current systems that you cannot shut the water off for hours on end.

Thank you,

Kris Mielnik | Commercial/Industrial Account Support
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Culliganh2o.com

 **Water you love.**

Jamie Kempf -- Minnetonka -----

1. How will this impact your business with regard to cost?
More parts on service trucks, more time for installs, less overall time throughout the day to complete other service duties
2. Is it going to add to your install time? Give a brief explanation.
Instead of an install taking 60-90 minutes, now it'll take 80-110 minutes with multiple trips to vehicle to get valves, piping, etc.
3. What, if any, is the benefit to the consumer? To businesses? To public health?
I don't see the big benefit to the consumer
4. Do you see an advantage to the bypass requirement? Disadvantages?
I see the disadvantage to the consumer as the confusion, if something is wrong and they had to use the 3-valve bypass.

Jamie Kempf

Northern Midwest Regional Area Manager

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Jason Hansen - Pine City -----

1. How will this impact your business with regard to cost?
This could add 150.00-300.00 to the installation depending on customers current plumbing situation. (they already complain about the cost)
2. Is it going to add to your install time? Give a brief explanation.
This would most definitely increase install time dependent on current plumbing situation. (1/2 hr -1 hr)
3. What, if any, is the benefit to the consumer? To businesses? To public health?
I do not see any benefit to this when the units already come with a bypass.
4. Do you see an advantage to the bypass requirement?
At this time I do not see any advantage to this requirement.
Disadvantages? **Cost**

Jason Hansen
General Manager

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Matt Newman - Sauk Center -----

As to the proposed 3 valve bypass, the only reason for this is for servicing the water treatment equipment. Every piece of equipment already comes with a bypass valve with it that negates the need for an external one. This would also add a substantial cost to the homeowner.

Matt Newman

Service Technician,

Sterling Water Culligan | 625 Lincoln Loop, Sauk Centre, MN 56378

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Michael Hanson – Sauk Center -----

1. How will this impact your business with regard to cost? **Unnecessary additional cost to the business and customer. given this additional cost.**
2. Is it going to add to your install time? Give a brief explanation. **Will absolutely slow the process to completion of any installation. Will affect productivity within our business.**
3. What, if any, is the benefit to the consumer? To businesses? To public health? **I see no benefit to the consumer, business or public health. Again, and unneeded and unnecessary cost passed on to the consumer and business. Our current WC license is valid and important. We take pride in our work and our work to be completed professional and legally.**
4. Do you see an advantage to the bypass requirement? Disadvantages? **Our water conditioning systems for residential have an approved bypass valve. Why residentially add another bypass. The disadvantage is the added cost and time delay to the consumer.**

Michael Hanson

Vice President

Commercial & Industrial Director

Master Water Specialist

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Richard Winter – St. Cloud -----

I don't see any benefits to all this. More labor more parts in the truck; what benefits are there to the customers?

Richard Winter
D & K Water Systems
St. Cloud, Minnesota

Justin Regnier – East St. Paul -----

Here are some thoughts:

Water softeners generally come with bypasses and will add to waste of consumer spending, and landfill waste.

There is already a law on the books requiring a bypass.

Manufacturer /integral bypasses are compact and match the system. 3-valve bypasses take up significantly more room and will be very tough to include in some tight space scenarios and with plumbing systems like type A pex where fittings cannot be tight to each other.

Do we see this stipulation applied equally to other appliances such as water heaters, booster or recirc pumps?

1. This will increase material and labor cost ultimately penalizing the consumer.
2. This will increase install time to up to an hour for standard installations and possibly more for tight difficult plumbing spaces.
3. I would say in some cases a full port ball valve may be easier to operate for the consumer but in some cases much worse.
4. I don't see a need at all to relitigate a law that already exists with the requirement of a bypass and isolation valves.

Thanks,

Justin

--

Justin Regnier (CWS-I)
Merle's Water Conditioning
651-777-1349 (office)

John Packard - Minnetonka -----

My input concerning the three-valve bypass being required:

I do not see the value to the consumer for the following reasons.

Significant added expense.

Additional pressure drop through it.

More possible leak points.

Three more valves to maintain.

Other appliances like water heaters and washers don't require it, why should softeners?

Thanks for the opportunity.

John Packard

Chairman

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Culligan.



Keith Johnson – Woodbury (Ecowater – Manufacturer)

I would like to communicate our position on the plumbing code discussion related to a required plumbed in 3-valve by-pass for water treatment systems. We are against this requirement for the following reasons:

- The requirement to plumb in a 3-valve bypass valve will add significant cost to the consumer.
- There is minimal to no advantage to the consumer by requiring plumbing in a 3-valve bypass valve.
- A large portion of water treatment products come with and are installed with a factory supplied by-pass valve. We are not against a requirement for a by-pass valve but we are against a requirement for a plumbed in 3-valve because we would like a factory supplied by-pass valve to be allowed.

Regards,

Keith Johnson | VP Product Management

EcoWater Systems LLC

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AJ Kerber -- Hopkins -----

Bypasses are important, but the customer is best served if we have the freedom to build it specifically for the jobsite. This might require separate valves, but almost all our equipment is provided with a bypass assembly on the back of the water softener or backwashing filter. These work well in most cases and are very reliable.

We have watched as the “appurtenance” by-passes have improved – from push-pull type that Culligan used successfully on portable exchange softeners (since the 50s) to the 3 in 1 brass by-pass block for sweat copper. They are really good now, and I have found it easier to train customers on their use. More important - and a great consumer benefit – I can more easily explain the operation over the phone at 2:00 am!

Please pass my thoughts along to the Plumbing Board.

***A.J. Kerber
Peterson Salt and Water Conditioning
Hopkins, Minnesota***

Brian Soderholm - Ramsey -----

Minnesota Plumbing Board
Karl Abrahamson, Chair
443 Lafayette Rd
St Paul MN 55155

Subject: 611.6 Water Conditioning By-Pass Capability

Dear Mr. Abrahamson and Plumbing Board Members:

We have considered the idea and value of requiring that by-pass systems be remote and separate from the equipment. My firm (and I) have many years of experience with by-passes and their effectiveness.

First of all – it is appropriate that we require by-passes for water conditioning – regardless of how unique we are in Minnesota to do so! Yes, it is hard to defend by-passes as a public health issue. But the fact is, they do make life easier for the plumbing contractor, the water conditioning contractor and for the owner or resident of a building. But the objectives are met by the appurtenance by-pass, which almost all manufacturers of residential equipment provide.

Please consider this:

- 1) requiring a separate three valve bypass system adds unnecessary cost burdens to homeowners.
- 2) adding this requirement would make Minnesota the only State, where bypass assemblies included with softeners/filters are not adequate.
- 3) ANSI/NSF certification of residential softeners requires the appurtenance by-pass.
- 3) It has been argued that shutting down a water system knocks a whole bunch of things loose and plugs up the plumbing system. That can be true, depending on the age of the plumbing and the quality of the water. But plumbers and water treatment contractors need to be capable this basic skill -- turning water on properly – slowly, bleeding air, flushing to a near open orifice fixture. Most are.
- 4) If water shut down is the issue -- why not have the same requirement for all other equipment, like water heaters?
- 4) The issue was already debated several years ago by the plumbing board. While that decision was interpretation of existing code, I did not hear a strong argument to change code from the Board.
- 5) If a three valve bypass system is installed, will those valves fail? A water softener should be maintained for 15 years and can be maintained for 25 years or more. Will the valves be a benefit when they are needed? We have all dealt with three valve bypass systems that do not work because the valves are old, scaled, or corroded.
- 6) To be effective, a remote by-pass requirement would have to describe the location and distance from the unit, to allow for any future replacement system to be easily installed.

The by-pass systems that my firm provides to our customers have been very well received for over 20 years. They do the job. They are easily operated by homeowners. We are not hearing a call for an improvement in these systems, nor do we have customers that I know of who prefer to use a a remote by-pass system.

The proposal for remote by-passes seems like a solution in search of justification. The added cost and additional work are not justified by the potential benefits.

Sincerely

Brian Soderholm

