

Plumbing Board  
c/o Department of Labor and Industry  
443 Lafayette Road North  
St. Paul, MN 55155-4344  
www.dli.mn.gov

## Plumbing Board Request for Interpretation

PRINT IN INK or TYPE

NAME OF SUBMITTER <b>Minnesota Water Quality Association (MWQA)</b>	Rule(s) to be interpreted (e.g., 4714.0330) <b>4714.611.5</b>
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The Minnesota Plumbing Code (MN Rules, Chapter 4714) is available at [www.dli.mn.gov/CCLD/PlumbingCode.asp](http://www.dli.mn.gov/CCLD/PlumbingCode.asp)  
Has a request for interpretation been submitted to Department of Labor and Industry (DLI) staff, either as a verbal request or a written request?  Yes  No

If "No," contact DLI staff at 651-284-5898. The DLI is responsible for administration and interpretation of the Minnesota Plumbing Code, and all requests must be processed and provided a DLI interpretation before being referred to the Plumbing Board. This form is intended to be used to request an interpretation from the Plumbing Board only as a resolution of dispute with DLI interpretation.

Code/Rule to be interpreted: <b>Water Conditioning Equipment Isolation and Bypass</b>	Name of DLI employee gave interpretation: <b>Brad Jensen</b>	Date interpretation originally requested: <b>4/26/2020</b>
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Provide a copy of the DLI interpretation with this request (a copy must be provided as reference).

Is there a local dispute with an Inspector of other official?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, state the name or type of official <b>John Wilder (Inspector, St. Louis Park), Steve Lano (Inspector, Maple Grove) Damien Lien (Inspector, Brooklyn Center) David Michkelson (Inspector, Edina) Sean Carpenter (Inspector, Blaine)</b>
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State the circumstances of the initial dispute:

In the four inspections listed and in additional jurisdictions, MWQA member plumbers and water conditioning contractors were required on new water softener installations to add redundant 3-valve bypass systems to water softeners with an integral service bypass appurtenance, of the type that has been in common use for decades. This required return visits to the jobsites and return visits for the inspectors.

Explain what you disagree with the interpretation given to you by DLI staff:

Virtually all available residential water softeners and filters come with an integral service bypass appurtenance. This device is installed permanently on the piping ("hard piped") and then connects up to the softener or filter using unions or compressed gasketed fittings. The bypass appurtenance, when cycled, allows untreated water to go around (bypass) the softener or filter, providing uninterrupted water to the home. The softener or filter can be easily and quickly removed for service, with no interruption to water supply. Once serviced, the softener or filter can be reattached, the bypass appurtenance opened, and softened or filtered water service resumed. The language of section 4714.611.5 reads that "Every water conditioning installation shall include the installation of isolation valves and a bypass valve which would allow the system to be serviced or removed without the need for shutting off the water service completely." The integral service bypass appurtenance provided by water conditioning professionals for decades achieves all these purposes without the need for \$200 - \$400 in additional valves and piping. Cycling the device isolates the softener or filter, allows it to be serviced, and allows it to be removed without interruption of water service. The intent of the code is met. Additional valves and piping are not necessary to achieve these ends and make the cost of treatment more expensive to the end user.

What is your interpretation of the language:

The integral service bypass appurtenances provided with nearly all residential softeners/filters are adequate for allowing the system to be isolated, serviced and removed per the code language. Additional valves and piping should not be required. There is no health benefit and it simply adds extra cost.

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**List any other information you would like the Board to consider:**

Water conditioning equipment is expensive. With the growth in recognized contaminants, water conditioning technology is becoming all-the-more necessary to homeowners/end users. It is important that we not add additional, unnecessary expenses to these installations, or we risk putting important solutions out-of-reach for many consumers. The existing, integral service bypass appurtenances have served their purpose well for many decades, allowing for uninterrupted water service during periods of equipment servicing. When clause 4714.611.5 was added to the new MN Plumbing Code, there was not discussion or debate (i.e. SONAR) of requiring extra valves and piping (and there being some sort of health or consumer benefit to doing so). We do not believe that this was ever the intent of adding this language. If it was the intent, then we believe that a thorough SONAR process needs to first be followed.

Admittedly, if equipment needed complete replacement, it is possible that water service would need to be shut off (just as if a water heater or expansion tank were being replaced, for example). But this is a rare, infrequent, and brief scenario that does not justify the additional cost of extra valves and piping. Moreover, there is no guarantee that the water service would not need to be shut off anyway, in order to modify the overall valves/piping if there are major differences in softener/filter design. And to be clear, the code does not state that there must be uninterpretable water service in the case of equipment replacement -- only during periods of removal and service.

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**Information regarding submitting this form:**

- Submit any supporting documentation to be considered electronically to [DLI.CCLDBOARDS@state.mn.us](mailto:DLI.CCLDBOARDS@state.mn.us). Once your Request For Interpretation form has been received, it will be assigned a file number. Please reference this file number on any correspondence and supplemental submissions.

**Information for presentation to the Committee:**

- You will be notified with the date of the Committee Meeting in which your Request For Interpretation will be heard.
- Limit presentations to 5 minutes or less.
- Be prepared to answer questions regarding the Code, the circumstances that led to the dispute and please bring copies of any documentation.

**What you can do if you disagree with the Board's determination:**

- You may appeal the Board's determination pursuant to Minn. Stat. Chapter 14.

**Office Use Only**

RFI File No.	Date Received by DLI	Dated Received by Board	Date of Board Meeting
Title of RFI	By:		

This material can be made available in different forms, such as large print, Braille or on a tape. To request, call 1-800-342-5354 (DIAL-DLI).

**Submitted by:**

NAME		FIRM NAME	
Brian Soderholm		Minnesota Water Quality Association	
ADDRESS		CITY	STATE ZIP CODE
3180 Country Drive		Little Canada	MN 55117
PHONE	SIGNATURE (original or electronic)	DATE	
763-785-2201	Brian Soderholm	7/1/22	

For assistance or questions on completing this form, please call 651-284-5898 or 651-284-5889.

Mailing address:

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