



July 18, 2022

Mr. Richard Becker  
Plumbing Board  
Minnesota Department of Labor and Industry  
443 Lafayette Road North  
St. Paul, MN 55155

**RE: MN Plumbing Code 611.5 Interpretation**

Dear Chair Becker and Members of the Plumbing Board,

On behalf of the Water Quality Association (WQA), we would like to express our concern regarding the interpretation of the Minnesota 2020 Plumbing Code section 611.5. We believe that the code in this section has been misinterpreted to require an additional bypass assembly on residential water conditioning equipment. After reviewing the Minnesota 2020 Plumbing Code and the justification in the Request for Action (RFA), we are confident that the integral service by-pass appurtenances already built-in to water conditioning equipment meet the requirements of the current plumbing code.

Section 611.1.1(2) of the 2020 Minnesota Plumbing code requires all residential softeners to be certified to NSF/ANSI 44 or assembled with NSF 61 components. NSF/ANSI 44 already mandates a by-pass device to be integrated into the installation of these systems. Thus, residential water conditioning equipment has an integrated by-pass valve, allowing maintenance and service to be conducted on the equipment without shutting off the water. The inclusion of a manufactured by-pass valve allows for the isolation of the water conditioning equipment and is in alignment with the [MN Statute § 326B.50 Subd.3\(2\)\(i\)](#). Therefore, the requirement for an additional three-valve by-pass assembly is redundant. Moreover, mandating an additional by-pass valve to be paired with an already certified residential softener, which complies with the state plumbing code, would ultimately burden the consumer and be costly to homeowners.

In the future, WQA would welcome any opportunity to serve as a resource to you and the Minnesota plumbing board. We have more than 2,500 member companies (over 70 in Minnesota) including manufacturers, dealers, and distributors who specialize in the water treatment industry and can provide valuable information. We appreciate the opportunity to weigh in on this important regulatory matter and if you have any questions, please do not hesitate to contact either of us directly or you can contact [govaffairs@wqa.org](mailto:govaffairs@wqa.org).

Best regards,

Jeremy Pollack  
Director of Government Affairs,  
Water Quality Association



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