UNIFORMITY OF INSPECTIONS COMMITTEE

Association of Minnesota Building Officials

**March 21, 2019**

**Blaine**

**Minutes**

1. **Housekeeping**:

* Hosts signed up for all open dates on 2019 Meeting Schedule
* Alphabetized index of past topics has been added to website
* Discuss goals and recruitment ideas for 2019 – Geven Rabe is attending outstate groups and teaching a CEU class. Using online resources to communicate with people who can’t attend meetings.

1. **Farewell and Thank you to Roger Axel who is retiring from the committee after many years of service.**

One of the things that makes us most human, and indeed is one of the highest callings in a community, is a desire to share and a responsibility to teach.  Both past and current members of the committee have benefitted from our formal and informal contact with Roger Axel.  He has, over the decades, dedicated countless hours to the greater community and the individuals in this field.  A true master at the height of his craft for many years, he has fostered and promoted numerous individuals and groups with his passion and knowledge of the codes. People do not grow and expand their experience unless they are pushed, challenged, and stressed to think and act beyond the comfortable nest they have made for themselves. In his teaching, Roger helped others foster the ability to think critically about the code. Behind him is a trail of code officials who are now masters themselves, or on their way to that status.

So now we say goodbye to Roger, at least from this committee, and recognize his long outstanding contribution to the ongoing discussion and the advancement of people, departments and concepts.  He will still be with us here in Minnesota from time to time in some fashion, but he can leave this group assured that he made an impact and that he gave us a platform to continue working from.  We can honor him best by taking every opportunity to share a bit of knowledge and simply teach.

1. **Topic:** **Commercial Window Washing Anchors**

**Question:** IBC 3112 requires window washing anchors for buildings four stories or more above grade plane, and lists 3 exceptions. Would you accept any alternates to the anchors in new construction? If so, what would be acceptable?

**Answer:** This code provision must be enforced, unless a building clearly meets one of the exceptions listed in code section IBC 3112.

One alternate that has been proposed to various cities is to prove the building owner has a contract with a window washing service that uses lift- style equipment rather than equipment that uses mounted anchors. This is not an acceptable alternate for the following reasons:

* Building owners and window washing contractors can change. Future building owners should not be put in the position of paying for anchors that the code required to be installed at time of construction.
* Window washing lift equipment that is left in front of windows can block egress, block Fire Department personal and equipment access. This can cause safety issues in the event of a fire, especially when the equipment is left over night or over the weekend without the equipment operator on site. In the event of a tragedy, the AHJ would not want to take on any liability by accepting lift equipment as an alternative to the anchors.
* Note – newer lifts can reach higher levels and may drive code changes in the future, until the code actually changes, the provisions must be enforced.

1. **Question:** Would you allow a copper gas line to be mounted directly to furnace duct work? IMC 305.3 states that pipe shall be attached to the “**building construction”** in an approved manner. What elements are considered building construction? What potential issues could arise from mounting the gas piping to the duct work?

**Answer:** The phrase ‘building construction” is not defined in the code, so it leaves a gray area as far as what is acceptable for mounting gas tubing. It would be up to the inspector / AHJ to decide whether or not to accept this installation.

Some potential issues to consider:

* Galvanic action between the copper tubing and the ductwork would most likely be mild and take many years to cause any problems. The presence of electric field can exacerbate the degradation of the copper.
* The tubing could possibly be exposed to vibrations that could result in damage over time. Again, it is not likely that this would be a problem.
* Does tubing connected to the bottom of a duct create a dangerous situation where it would be likely to be damaged or disconnected?

1. **Topic: Truncated Domes:**

**Question:** Site designers have variously asked me, “where are detectable warnings/truncated dome sections required?”   MNDot Design standards, often adopted by local units of government, require detectable warnings at sidewalk intersections in the public right-of-way.  However, in private developments and on private parcels the answer isn’t as easy.

Based on the sections of the Minnesota Accessibility Code cited below, I haven’t been able to provide a clear answer.  As far as I can tell, “detectable warning surfaces” / truncated domes are clearly required at:

* open edges of train and subway platforms;
* raised marked crossings *(Unfortunately as an undefined term, we don’t all know what a “raised marked crossing” is.)*

Anywhere else in the cited code sections detectable warnings appear to be optional, though if installed they must meet the installation standards. I am interested in your opinion as to where detectable warnings must be provided.

**Answer** provided by Karen Gridley:

**Informational Commentary Re: Truncated Dome/Detectable Warnings:**

There is no requirement to provide the truncated domes you have shown within the boundary of the site on this project and they may be omitted at the owner’s option.

The MN Accessibility Code does not require truncated dome detectable warning surfaces on curb ramps, flush sidewalk area, or any area within the boundary of a site.  In Minnesota, the only location required to have truncated domes by the MN Accessibility Scoping requirements are passenger transit platform edges bordering a drop-off, and circulation paths that cross tracks.  (MN Accessibility Scoping Section 1109.10).

Additionally, the Federal ADA no longer requires truncated dome detectable warning surfaces on curb ramps, flush sidewalk area, or any area *within the boundary of a site*.  As of the new 2010 ADA Standards, the U.S. Access Board relocated the requirement for truncated domes to separate proposed rulemaking for Public Rights-of-Way.  The new 2010 ADA Standards (which excludes the detectable warning requirement) came into force in March of 2012, therefore truncated domes are now only required on curb ramps or flush sidewalk areas that are specifically in the public right of way, such as city and municipal sidewalks.

Truncated dome surfaces should not be provided in access aisles or on any other clear floor areas required to serve as wheelchair maneuvering space.

Surfaces containing truncated domes and similar detectable warning materials are difficult to negotiate with wheeled mobility aids and are sometimes painful to negotiate over due to the vibrations they cause.  The new recommendation from the U.S. Access Board is to avoid materials or construction methods that create bumpy and uneven surfaces in areas and along routes required to be accessible.  The exception is that truncated domes should still be provided on city/municipal curb ramps that are specifically within the public right-of-way.

Commentary of all of the changes made to the Federal ADA Standards, where they document why they deleted the requirement from the ADA Standards and relocated to only be required on DOT public rights of way can be found in the Access Board’s document called “Section-by-Section Analysis” in their commentary for Section R208 Detectable Warning Surfaces on Curb Ramps at this link [https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/proposed-rights-of-way-guidelines/section-by-section-analysis?highlight=WyJkZXRlY3RhYmxlIiwiZGV0ZWN0ZWQiLCJkZXRlY3Rpb24iLCJkZXRlY3QiLCJkZXRlY3RhYmlsaXR5IiwiZGV0ZWN0cyIsImRldGVjdGluZyIsImRldGVjdGlvbnMiLCInZGV0ZWN0YWJsZSIsIndhcm5pbmdzIiwid2FybmluZyIsIndhcm4iLCJ3YXJuZWQiLCJ3YXJucyIsImRldGVjdGFibGUgd2FybmluZ3MiXQ](https://urldefense.proofpoint.com/v2/url?u=https-3A__linkprotect.cudasvc.com_url-3Fa-3Dhttps-253a-252f-252fwww.access-2Dboard.gov-252fguidelines-2Dand-2Dstandards-252fstreets-2Dsidewalks-252fpublic-2Drights-2Dof-2Dway-252fproposed-2Drights-2Dof-2Dway-2Dguidelines-252fsection-2Dby-2Dsection-2Danalysis-253fhighlight-253dWyJkZXRlY3RhYmxlIiwiZGV0ZWN0ZWQiLCJkZXRlY3Rpb24iLCJkZXRlY3QiLCJkZXRlY3RhYmlsaXR5IiwiZGV0ZWN0cyIsImRldGVjdGluZyIsImRldGVjdGlvbnMiLCInZGV0ZWN0YWJsZSIsIndhcm5pbmdzIiwid2FybmluZyIsIndhcm4iLCJ3YXJuZWQiLCJ3YXJucyIsImRldGVjdGFibGUgd2FybmluZ3MiXQ-26c-3DE-2C1-2C7HlW6lOXQUYxg8UvtJ7HDtr8gpLC-2DqJ7XamnqNKPU7V2PIBIxy25hHFjEHamlBjiSbyFi9D0JYGa1440TziNG9KdzZu3G7FUPBimsDGzMWpBuQ-2C-2C-26typo-3D1&d=DwMF-g&c=wZIz6BR1yds6ABxMNYcTPKRj39yq004hegHRzkEIjMM&r=oKMUm3USclvxe2SX83Fx63zuM-TMI9B4ttoX0ScqN_o&m=ztSu9073u52eFaGDFnynsmnxr5h-vf7-qUPcPcDUyFc&s=MBaZde0x7Isd0oRtiABfb27zKQ9FEI9N6fdg6PgyCgI&e=)

1. Discussion of upcoming job shortages, training of incoming inspectors, status of State’s Apprenticeship program.

**Next Meeting: April 18th, 2019 9:00 am – Hastings 101 4th Street East Hastings**, **MN** **55033**