

STATE OF MICHIGAN



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DEPARTMENT OF LABOR

ELIZABETH P HOWE, Director

DATE: November 2, 1989 **DOCUMENT #89-83**
TO: Construction Code Commission
FROM: Bud Kraft, Chief, Barrier Free Design Division
SUBJECT: Interpretation Request

Question: Is the number of required barrier free plumbing fixtures based on the total required building fixtures count or on the fixture count in each individual toilet room? (i.e. If a building is required to have 6 men's toilets and they are putting in 3 toilet rooms with 2 each, does the code require 1 toilet or 3 toilets to be barrier free?)

Answer: Section 512.11.1 states:

All buildings shall be provided with the required number of toilet fixtures in accordance with R408.30701 et seq. of the Michigan Administrative Code (The State Plumbing Code). All public and employee toilet and shower rooms shall be provided with at least 1 fixture for each 10 fixtures or fraction thereof, meeting the requirements specified in Sections 512.11.1 to 512.11.12. (emphasis added)

Commentary: This section requires the number of barrier free fixtures to be based on the required fixture count of each toilet room. Therefore, any toilet room or shower room with required fixtures must have barrier free fixtures based on the 1:10 ratio.

As an example, if only 1 fixture in 10, based on total fixture count, was required to be barrier free, then a building that was required to have 10 fixtures (5 male/5 female) would not be required to have barrier free fixtures for each sex, since only 1 fixture would be barrier free. This example further demonstrates the Intent of Section 512.11, requiring each toilet room with fixtures required by the Plumbing Code to also have barrier free fixtures.

The Intent is made clearer by Section 512.11.1 (c) which states:

Exceptions: All toilet and shower rooms and fixtures beyond the requirements specified in R408.30701 et seq. of the Michigan Administrative Code are not required to comply with this section.

Therefore, in the example given, the code would require 3 barrier free fixtures; 1 in each toilet room containing required plumbing code fixtures.