



Mid-South Engineering Company

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CODE MATTERS

Codes **do** matter in the building and industrial plant world.....A lot.

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Question:

Is it a requirement to provide accessible toilet rooms and elements within the industrial plant?

Reference Code:

The International Building Code (IBC), Americans with Disabilities Act (ADA 2010)

The following will hopefully clear up many misunderstandings about accessibility design which we often lump into one word – handicap.

Fact #1: The ADA (a law) is written as civil rights legislation and not as a building code.

Fact #2: Enforcement of ADA is the responsibility of the Department of Justice, not the fire marshal or building code official.

Fact #3: Everything is required to be accessible by the IBC (buildings and site) unless it is specifically exempted.

Fact #4: Physical disabilities can be permanent or temporary, can involve all levels of abilities and can range from persons with minor visual, hearing or mobility impairments to persons who are blind, deaf or confined to a wheelchair.

So the designers' job is at first a scoping job – to determine what and where accessibility is required or how many accessible elements are required and then determine the technical requirements needed. An industrial plant is usually classified as a commercial facility, so accessibility is required. Most plants have office type areas, separate from the factory, where a person with a disability may very well work or arrive as a visitor. This is pretty clear we must provide the required accessibility elements.

But what about inside the plant? Depending on the level of safety requirements, a plant manager may determine that anyone with a disability could be at risk for injury and may not allow passage past the main office building in order to meet OSHA requirements.

This is a valid, arguable point. But other more remote areas of an industrial plant may be trickier to determine the level of accessible design. Now we want to use as many of the 15 exemptions in the IBC to comply with the code and provide for the acceptable level of inaccessibility that is reasonable and logical. The following are some of the exemptions typically associated with industrial plants listed in the International Building Code.

Exemption: Work areas, or portions of work areas, less than 300 sq. ft. in area and located 7 inches or more above or below the ground or finish floor where the change in elevation is essential to the function of the space shall be exempt from all accessibility requirements. A raised scale house less than 300 sq ft could be exempt. Equipment access platforms or a raised control room could be exempt. If there is a reason to elevate an area for concerns about security or safety, these areas are not required to be accessible. An oil change pit in a vehicle repair shop is an example of a lowered work area, exempt from accessibility requirements.

Exemption: Occupancies in Group "U" (utility buildings) are exempt on the basis that such structures are a low priority when considering the need for accessibility, however, access is required to paved work areas in these structures. Electrical Motor Control Center structures can usually be classified as "U" occupancies and are therefore exempt.

Exemption: Limited access spaces – non-occupiable spaces accessed by ladders or catwalks or very narrow passageways are not required to be accessible.

Exemption: Equipment spaces – spaces frequented only by personnel for maintenance, repair or monitoring of equipment are not required to be accessible.

In general, areas where the work could not reasonably be performed by a disabled person due to the physical requirements of the job activity, could be exempt. Existing buildings fall into another category that have different rules.

Use your Engineers and Architects to determine where accessibility is required to be in compliance with the law. There are so many specific situations and rules in the code where accessibility is not required, it is difficult to list them in a brief overview.



Code Matters (cont'd)

TIPS:

1. In many cases, it is more cost effective to design restrooms with accessible clearances and inexpensive grab bars than to risk an inspector's challenge.
2. Most accessible routes have the same clearances as egress routes which are required by the code anyway.
3. Many egress requirements for OSHA and the National Electric Code for industrial plants also comply with the accessibility code.
4. Many work spaces for private facilities, under a certain square footage, will have exemptions for accessible elements. Public facilities and government buildings take accessibility to a whole different level.



"In the tradition of a community coming together to raise a barn, Mid-South Engineering is committed to working with our friends and neighbors as partners, knowing we can accomplish more by working together, with the common goals of lifting each other's burdens and side-by-side framing our future for the better."



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