



MIKE CAUSEY, INSURANCE COMMISSIONER & STATE FIRE MARSHAL
BRIAN TAYLOR, CHIEF STATE FIRE MARSHAL

November 18, 2019

Chris Whaley
Davidson County
912 Greensboro Street
Lexington, NC 27292

**RE: 2018 NC Plumbing Code, Section 403.3.1
Fixture Location Relative to the Associated Building**

Mr. Whaley:

This letter is in response to your letter of request for formal interpretation dated October 17, 2019 that I received by email on October 17, 2019. You stated in your letter three questions:

1. Does this code mean simply that the required plumbing facilities / fixtures must be located within the building?
2. Or can the required plumbing facilities / fixtures be located within the site or adjoining buildings as long as they are along an accessible route and within travel distances?
3. If it is allowed for the required plumbing facilities / fixtures to be located within the site in an adjoining building, other than an accessible route, are there any additions requirements?

Notes: All code references are to the 2018 North Carolina Code editions unless specified otherwise.

Remarks:

According to the 2015 IBC Commentary the intent of 403.3.1 is that toilet fixtures be available to occupants whenever the building(s) associated with the fixtures is occupied.

Responses:

Question #1:

The code does not require the fixtures to be located within the building that the fixtures are servicing.

Question #2:

The fixtures can be located separate from the building that they serve, but the fixtures must be located such that they are guaranteed to be available whenever the building that is being served is occupied and compliance with the travel distance allowances of NC Plumbing Code, Section 403.3.3 is maintained. NC Building Code, Section 1104.2 requires an accessible route to the fixtures.

Question #3:

See response #2 above.

As a matter of reference, a copy of your letter (Attachment A below) requesting a formal interpretation is included with this letter.

Please call if you have comments or questions.

Sincerely,



Carl Martin, RA
Chief Code Consultant

cc: File
Robbie Davis, Chairman – BCC
Keith Rogers, Chairman Plumbing Code Standing Committee – BCC

ATTACHEMNT A



APPENDIX E
APPEALS
NORTH CAROLINA
BUILDING CODE COUNCIL
325 North Salisbury Street, Room 5_44
Raleigh, North Carolina 27603
(919) 647-0095

APPEAL TO NCDOI/NCBCC Hearing Date ___/___/___
GS 153A-374, GS 160A-434 GS 143-140, GS 143-141
Formal Interpretation by NCDOI Appeal of Local Decision to NCBCC
Appeal of Local Decision to NCDOI Appeal of NCDOI Decision to NCBCC

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North Carolina State Building Code, Volume 2018 NCPC - Section Section 403.3.1

REQUEST ONE: [X] Formal Interpretation by NCDOI [] Appeal of Local Decision to NCBCC
[] Appeal of Local Decision to NCDOI [] Appeal of NCDOI Decision to NCBCC

Type or print. Include all background information as required by the referenced General Statutes and the attached policies. Attach additional supporting information.

Per the code section referenced above it states that "Access to the required plumbing facilities / fixtures shall be from within the building or from the exterior of the building." Does this code mean simply that the required plumbing facilities / fixtures must be located within the building? Or can the required plumbing facilities / fixtures be located within the site or adjoining buildings as long as they are along an accessible route and within travel distances? If it is allowed for the required plumbing facilities / fixtures to be located within the site in an adjoining building, other than an accessible route, are there any additions requirements? Example: Signage, Marked Path, Covered Route, etc.? (This question is for groups other than Education Use)

REASON:

To clarify the requirements for access to plumbing fixtures and allowed location of the required facilities and fixtures.

Signature Christopher A Whaley Digitally signed by Christopher A Whaley Date: 2019.10.17 13:57:31-0400

DATE: 10/17/19

APPEAL TO NCDOI/NCBCC

FORM 3/14/17