

## ACCESSIBLE SHOWER ENCLOSURES

### Question:

The 2006 UPC has an exception to Section 411.6 and its intent is not clear. We have provided trough drains at the threshold of accessible showers in the past, but it is now uncertain whether this exception precludes the need to do that in the future. Are none of the provisions found in Section 411.6 applicable to accessible showers?

### Answer:

The exception to Section 411.6 (shower receptors) reads as follows:

“Exception: Showers that are designed to comply with the accessibility standards listed in Table 14-1”. [Table 14-1 cites ANSI A117.1 – 2003 edition as the applicable Standard]

ANSI A 117.1 addresses “Shower Compartments” in Section 608. The American College Dictionary defines a “compartment” as “a separate room, section, etc”. By that definition the shower *compartment* (enclosure) shall comply with the requirements stipulated in ANSI A117.1, Section 608. These rules are not applicable to space outside the “compartment”.

The basic text of UPC Section 411.6 requires a minimum 2 inch elevation difference between the top of a shower drain and the elevation of its threshold. The objective is to contain water within the shower enclosure as it accumulates. When this can not be accomplished because of the shallow configuration of the shower floor it becomes necessary to find an alternative means by which to prevent, or to collect, spillage from the shower enclosure. Water spilled onto the floor adjacent to a shower compartment creates a potential slipping hazard and results in unnecessary risk to the person(s) assisting the individual who is handicapped. This condition is counter to the basic objectives of the UPC, and specifically those of Section 411.6. To allow spillage onto an adjacent floor surface when a special-use shower is unable, by virtue of its design, to contain water *within* the compartment represents an obvious failure to achieve the “intent” of the Code.

Consequent to the original adoption of A117.1 many years ago the City of Phoenix required designers to provide a suitable way to prevent water from flowing beyond the threshold of an accessible shower enclosure. Many designers have chosen to place a trough at the entrance to the shower enclosure, others have employed a variety of means that were more suitable to their specific project. The exception to Section 411.6 does not eliminate the need to prevent water spillage onto walking surfaces *outside* the shower enclosure. Trough drains placed at the threshold of a shower are not installed within the shower enclosure, therefore language found in the exception to Section 411.6 is neither applicable nor relevant to the installation of

trough drains *outside* of the enclosure. The writers of ANSI A117.1 are concerned about serving the needs of those who are unable to utilize a standard shower facility. The writers of the Plumbing Code are interested in technical and life-safety matters that are unrelated to accessibility, but neither of these groups is uninterested in the concerns of the other. The "Exception" to UPC Section 411.6 is an accommodation to the needs of the accessibility Code. However, the exception to Section 411.6 is not intended to disregard fundamental health and safety concerns, especially when they have no impact on the objectives of the ANSI A117.1 Code writers. The UPC and ANSI A117.1 are not mutually exclusive. Application of one does not preclude application of the other when there is no conflict. Trough drains outside the threshold of a shower are not addressed by ANSI A117.1, and do not represent a conflict with the objectives of the Accessibility Code.