Texas Department of Licensing and Regulation

Architectural Barriers

TM 2013-17

Water Closet Clearance - Overlap

Effective Date: June 1, 2013 2012 TAS Reference: 604.3.2

Based on TAS 106.3 and the application of terms and definitions in the sense that the text implies, the following clarifications are provided to address the water clearance overlap requirements of TAS 604.3.2.

Associated

TAS 604.3.2 allows "associated" grab bars, dispensers, sanitary napkin disposal units, coat hooks, and shelves to overlap the required clearance around an accessible water closet. Based on the collegiate definition of "associate;" these elements are closely related or connected to the function and use of the water closet.

Dispensers associated with the use of a water closet and allowed to overlap the water closet clearance include seat cover, feminine hygiene product, disposal bag, and toilet paper dispensers. These dispensers must comply with all applicable provisions of TAS and cannot violate the protruding object requirements of TAS 204 and 307. Soap and towel dispensers and other dispensers unrelated to the use of a water closet may not overlap the water closet clearance.

Shelves and coat hooks provided for the placement of items and garments during the use of a water closet are allowed to overlap the water closet clearance and must comply with TAS 213.3.7. Only shelves and coat hooks are referenced in TAS 604.3.2, therefore, other types of storage such as supply closets and cabinets, clothes rods, and drawers may not overlap the water closet clearance.

Fixtures

TAS 604.3.2 also allows the clear floor space and clearances required at other "fixtures" to overlap the water closet clearance.

For purposes of compliance with TAS 604.3.2, the reference to "fixture" shall mean the plumbing fixtures identified in TAS 213.3 and baby changing tables which are identified as convenience fixtures in Advisory 604.8.1.1. None of these fixtures shall be located within the required water closet clearance except as allowed by the Exception to TAS 604.3.2. As noted above, only the clear floor and clearance may overlap; not the actual fixture.

Obstructions

"Obstructions" are also prohibited by TAS 604.3.2 within the required water closet clearance. An obstruction is any element that violates the protruding object requirements of TAS 204 and 307.