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Division of Public Health

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POSITION STATEMENT: Ceilings in Food Establishment Toilet Rooms (Bathrooms)

PURSUANT TO: 15A NCAC 18A "Rules Governing the Food Protection and Sanitation of Food Establishments" and the North Carolina Food Code Manual, Section 6-101.11

SOURCE: Kevin Dodge, Environmental Engineer
Environmental Health Section
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QUESTION:
Do toilet room ceiling tiles have to be nonabsorbent?

DISCUSSION AND RATIONALE:
Paragraph 6-101.11(A) of the North Carolina Food Code addresses indoor floor, wall, and ceiling finishes "under conditions of normal use." Paragraph (A)(3) of that Section requires those finishes to be "nonabsorbent for areas subject to moisture such as food preparation areas, walk-in refrigerators, warewashing areas, toilet rooms ..."

Under conditions of normal use toilet rooms are generally not subject to the same moisture conditions as the other areas mentioned in paragraph 6-101.11(A)(3). Therefore, if they are in a toilet room not subject to moisture, the ceiling tiles do not have to meet the nonabsorbent criterion. Of course the ceiling tiles must be smooth, easily cleanable, and in good condition.

Toilet rooms that are subject to moisture should be relatively easy to identify because of the possibility of humid conditions, the need for constant ventilation, and the presence of visible condensation on the floor, walls, and ceiling. Ceiling tiles in this environment that are not nonabsorbent will probably show visible signs of sagging and/or stains. In that case, the ceiling tiles should be replaced with ones that are nonabsorbent.

RESPONSE / INTERPRETATION:
The Environmental Health Section and FDA agree that ceiling tiles in toilet rooms that are not subject to moisture, that are in good condition, and that meet the definitions of SMOOTH and EASILY CLEANABLE (as required in Code paragraph 6-101.11(A)(1)) do not have to be nonabsorbent.

REFERENCES:
North Carolina Food Code

NOTE: Position statements are policy documents to clarify how to interpret or enforce a law or rule. They are not enforceable on their own, but are intended to promote uniform interpretation and enforcement of the underlying law or rule.

<http://ehs.ncpublichealth.com/faf/food/planreview/index.htm>

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