



March 15, 1996

Mr. Jimmy Clayton
Regional Specialist
717 Berman Clayton Road
Timberlake, NC 27583

Dear Jimmy:

I am writing seeking clarification concerning rule .2817(d) of the Rules Governing the Sanitation of Child Day Care Facilities. The rule indicates that a diaper changing area be located proximate to a toilet room or flush rimmed sink. My present interpretation of this rule is that this does not require that a toilet or flush rimmed sink to be in the same room, but could, for instance be a nearby hall toilet. This interpretation takes into account that rule .2819(f) does not require the disposal of diaper feces in a toilet and, in fact does not allow the rinsing of diapers in a day care facility.

As the use of the toilet or flush rimmed sink is a voluntary practice to be used on those occasions determined by the operator, my opinion has been that these facilities do not need to be immediately adjacent or entered from the diaper changing area. My discussions with operators on the use of these facilities tends to support this opinion. Apparently, in order to assure compliance with the no rinse rule, most operators either wrap and dispose of disposable diapers or wrap cloth diapers to be sent home in the "as is" state, so to speak.

In recent plan review discussions with chain day care operators, I have learned that other interpretations of this rule have been used. Therefore, I seek clarification to assure that Wake County is properly addressing this issue and, if necessary, to make whatever changes to our present policy are needed

Thank you for your assistance and if you have any questions I can be reached at 919-250-4371.

Sincerely,

Robert P. Grigston, R.S.
Supervisor, Food, Lodging and
Sanitation Section
Environmental Health Division

RPG/sc

Copy: Ed Norman
Peggy Montalbano
Roger Fortman

"Caring Today for Healthy Tomorrows"

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Environmental Health

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
Linda C. Sewall, Director



April 10, 1996

Mr. Robert P. Grigston, R.S.
Supervisor, Food, Lodging and Sanitation Section
Environmental Health Division
Wake County Health Department
P.O. Box 14049
Raleigh, N.C. 27620

Dear Robert:

I am writing in response to your request, dated March 15, 1996 for clarification concerning rules .2817(d) and .2819(f) of the Rules Governing the Sanitation of Child Day Care Facilities.

After conferring with Ed Norman, Childhood Lead Poisoning Prevention Branch Head; Sue Grayson, Food and Lodging Sanitation Branch Head; and Jack Knight, Regional Environmental Health Specialist, it is our conclusion that your interpretation of this rule as outlined in your March 15, 1996 letter is correct.

If you have further questions concerning this situation please feel free to contact me at 910-364-8520.

Sincerely,

Jimmy B. Clayton, R.S.
Regional Lead Specialist
Childhood Lead Poisoning Prevention Branch

copy: Ed Norman
Sue Grayson
Jack Knight
Roger Fortman
Peggy Montalbano



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