

# SLV/HD



Salt Lake Valley Health Department

Division of Environmental Health  
Royal Delegge, Ph.D., L.E.H.S. Division Director

788 East Woodoak Lane  
Murray, Utah 84107-6379  
phone 385-468-3860  
fax 385-468-3861  
[www.slvhealth.org](http://www.slvhealth.org)

October 10, 2012  
PDI, Inc.  
c/o Rand Ackroyd

Dear Mr. Ackroyd:

The Salt Lake Valley Health Department is seeking a formal opinion from PDI, Inc. regarding changes to the 2012 International Plumbing Code and its effect on hydro-mechanical grease interceptor installation. Specifically, Section 802.8.1:

**802.8.1 Food utensils, dishes, pots and pan sinks.** Sinks used for the washing , rinsing or sanitizing of utensils, dishes, pots, pans or service ware used in the preparation, serving or eating of food shall discharge indirectly through an air gap or an air break to the drainage system.

Allowance in the 2009 IPC for the direct connection of such sinks to the drainage system has been removed. Language from the 2012 IPC Code and Commentary states: *Because commercial kitchen pot-and-pan sinks are typically required by the local health department regulations to be indirectly connected to the sanitary drainage system, the 2012 edition of the code requires these sinks to be indirectly connected. The logic for this is that even though such sinks are said to be used only for washing dishes, pots and pans, the truth is that, many times, the sink is often used as a food-preparation sink.*

The Salt Lake Valley Health Department's concern with the change involves hydro-mechanical grease interceptors. A proposed state-wide change to the 2012 IPC requires hydro-mechanical grease interceptors to be directly connected to the drainage system. (diagram attached) The rationale for the change is that if a hydro-mechanical grease interceptor is indirectly drained to a floor sink, the PDI listing would be violated. The argument goes on to say that hydro-mechanical grease interceptors must be installed according to the manufacturer's installation standards, or again, the PDI listing would be violated. Is either of these arguments valid?

I have reviewed Standard PDI-G101. It appears that the testing protocol for a hydro-mechanical grease interceptor requires the outlet to be drained into an open skimming tank. This would be similar to discharging to a floor sink. The preferred health department installation is to drain sinks through the flow control into the hydro-mechanical grease interceptor which then drains to an open floor sink.

Health departments have long endeavored to take all reasonable actions to preclude the backflow of sewage into sinks used for food preparation. Having an outlet from a hydro-mechanical grease interceptor discharge into a floor sink is just another effort to protect food and prevent disease.

Sincerely,

*Kerry Cramer*

Kerry Cramer, LEHS  
Bureau of Sanitation & Safety  
Voice: 385-468-3790  
Fax: 385-468-3836  
Website: [www.slvhealth.org](http://www.slvhealth.org)

Diagram of proposed state-wide amendment to 2012 IPC

