

# TAS News Letter

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## Knee space or not knee space under the sinks. To help clarify TM 2012-09

The name of the room- kitchen, kitchenet, break room, coffee bar, lunch room, break room etc. does not determine compliance. It must be determined if the room is a “kitchen” or “non-kitchen”, by what is actually in the room – the attachment should help clarify “kitchen or non-kitchen”.

In accordance with TAS 106.5.28, kitchenettes and break rooms are not employee work areas; therefore, they must be accessible and must be designed and constructed to comply with TAS.

Understand that the break room or kitchen that we are talking about is a room that is a common use space used in a business for eating lunches or taking breaks, a non-work area type room. The sinks in these types of rooms are required to be 34” A.F.F. for break rooms or this type of common use kitchen or kitchenettes.

### Examples of Labeling Rooms

I may look at a set of plans, and a room will be called a break room with a built-in microwave. This room is actually a kitchen that falls under 606 & 804 kitchen and kitchenettes according to TDLR.

I may look at a set of plans, and it will be called a kitchen with no (FIXED) built in cooktop, conventional range, oven or built-in microwave (this is a break room). Per TDLR it is a non-kitchen, it is a room for eating lunch. This room does not have the privilege of the exception not to have knee space. A non- kitchen or break room like this one will always be required to have knee space under the sink per TAS 606. No exceptions.



The one factor that determines whether it is a break room or a kitchen is the ability to cook with a built-in(fixed) appliance such as a cook top, conventional range, oven, or built-in microwave. If you can cook with a built-in or fixed appliance it is a kitchen.

**AND** the **one factor** that determines whether a kitchen is required to have a forward approach to the sink (knee space) is if the kitchen has a **cook-top or conventional range**. Something **with burners**.

Conventional range or cook tops = knee space under the sink



AND the **one factor** that allows you to have a **parallel approach** (no knee space) to a 34" high sink in a kitchen is if it **does not** have a Cook Top or a Conventional Stove (**no burners**). This kitchen may have a fixed Oven, Microwave or Convection Oven.

Built in Microwave, you can cook in it= knee space is optional to the 34" high sink.



Must comply with 804.4 and 606. Parallel approach allowed to kitchen sink since no cooktop or conventional range is provided based on 606.2, Exception 1 which reads: A parallel approach complying with 305 shall be permitted to a kitchen sink in a space where a cook top or conventional range is not provided and to wet bars.



**Violation-** Needs knee space-Cook on top of the range= knee space



**Violation-** Needs knee space-Cook on top of the range= knee space



**Correct,** Cooktop requires the knee space



**Correct,** nothing to cook on top of = The sink does not require knee space



**Correct,** nothing to cook on top of = The sink does not require knee space

## Sinks & Storage in Kitchen, Breakrooms, and Wet Bars

Type of facility	Kitchen or Bar	Sink	Sink Approach	Storage
Area with fixed or built-in: Cooktop or Conventional Range	Kitchen <b>804</b>	<b>606</b> Lavatories and Sinks	Only Forward <b>606.2</b>	<b>212 &amp; 804.5</b> 50% of shelving must comply w/ <b>811</b>
Area with fixed or built-in: Oven, Microwave, Convection Oven (no cooktop or range)			Forward <b>606.2</b> or Parallel <b>606.2 Ex 1</b>	
Area with cooking facility not fixed (e.g., microwave not fixed)	Not a kitchen	<b>606</b> Lavatories and Sinks	Only Forward 606.2	<b>225- one of each type</b> must comply w/ <b>811</b>
Area with no cooking facility				
Bar with fixed cooking facility	Kitchen <b>804</b>	<b>606</b> Lavatories and Sinks	Only Forward <b>606.2</b>	<b>212 &amp; 804.5</b> 50% of shelving must comply w/ <b>811</b>
Bar w/sink and no cooking or dishwasher. A space used <u>only</u> for mixing drinks.	Is a wet bar, Not a kitchen		Forward <b>606.2</b> or Parallel <b>606.2 Ex 1</b>	
Bar w/sink and cooking facility that is not fixed (e.g., countertop microwave)	Not a wet bar, Not a kitchen		Only Forward <b>606.2</b>	

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