Code Amendment Proposal Form
For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

CONTACT INFORMATION

Name: Mark Jelinske, P.E. Date: 05/02/19
Phone: 303-239-2703 E-mail: mjelinske@rmhgroup.com
Organization: The RMH Group Inc.

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AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IPC

If you submitted a separate coordination change to another code, please indicate which code:

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
<th>Acronym</th>
<th>Code Name</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>(e.g., DBC-IBC, DBC-IEBC)</td>
<td>IGCC</td>
<td>International Green Construction Code</td>
</tr>
<tr>
<td>BC</td>
<td>International Building Code</td>
<td>IMC</td>
<td>International Mechanical Code</td>
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<tr>
<td>EBC</td>
<td>International Existing Building Code</td>
<td>IPC</td>
<td>International Plumbing Code</td>
</tr>
<tr>
<td>ECC</td>
<td>International Energy Conservation Code</td>
<td>IRC</td>
<td>International Residential Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: ☐

Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is BOLDING, STRIKEOUT AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

Code Sections/Tables/Figures Proposed for Revision:
IPC -1003.3

Proposal:
Delete Section 1003.3 in its entirety and substitute as follows:

1003.3 Grease Interceptors. Grease interceptors shall comply with the requirements of the Wastewater Management Division, the Department of Public Health & Environment, and the following:

1003.3.1 Grease interceptors and automatic grease removal devices required. A grease interceptor shall be required to receive the drainage from all fixtures, drains, and equipment located in commercial kitchen areas and warewashing areas.
This will reduce design and construction cost caused by conflicting regulations. There are both more restrictive and less restrictive impacts.

<table>
<thead>
<tr>
<th>Exceptions:</th>
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<tbody>
<tr>
<td>1) Bars and Beverage stations that are not within the kitchen area</td>
</tr>
<tr>
<td>2) Where approved by Wastewater Management Division.</td>
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</table>

1003.3.2 Food waste disposers. Food waste disposers in commercial kitchens shall be routed through the grease interceptor. Exception: Food waste disposers dedicated to vegetable preparation, and where other means of disposal of meats, oil, and grease waste is provided.

1003.3.3 Grease Interceptor Capacity. Grease interceptors shall be sized in accordance with the procedures established by Wastewater Management Division.

1003.3.4 Hydromechanical Grease Interceptors and automatic grease removal devices. Hydromechanical Grease Interceptors and automatic grease removal devices shall not be allowed, except as approved under the provisions of DBC-IBC Section 106.

1003.3.5 Sewage Ejectors: Sewage ejectors shall not be installed upstream of grease interceptors.

Supporting Information:

The purpose of this proposed amendment is to reduce confusion regarding the conflicting requirements of the base IPC and the requirements of Wastewater Management Division (WWMD) and Department of Public Health and Environment (DPHE).

The reason for this proposed amendment is the multiple conflicts with WWMD and DPHE requirements, such as:

- WWMD requires ALL fixtures and drains within kitchen and warewashing areas, while the IPC has restrictions on the types of fixtures allowed to be routed to the grease interceptor.
- WWMD requires Food waste disposers to be routed to the grease interceptor, but IPC prohibits this practice.
- The IPC allows fixture based hydromechanical and automatic grease removal type grease interceptors, but the WWMD sizing criteria and details only address system based retention time type grease interceptors. DPHE prohibits servicing of grease interceptors within the foodservice area, which can make fixture based hydromechanical interceptors impractical. The requirement for dishwashers and food waste disposers to flow through the interceptor make these small, flow based interceptors inappropriate. If a project has a unique application where such interceptors are a valid option, it should follow the DBC Section 106 requirements of for alternate materials, design, and methods in order to coordinate the requirements of the several Denver entities having jurisdiction.
- IPC prohibits “emulsifiers and chemicals” from being added to the grease interceptor system. WWMD requires dishwashers and pot sinks to be routed to the grease interceptor. Most dishwashing agents can be considered emulsifiers and are definitely chemicals (along with H2O). IPC allows ongoing dispensing of certain additives but this issue is better enforced by the operational authority of WWMD regulations rather than the permitting authority via the IPC.

Substantiation:

This is submitted in the context of the desire to bring longstanding policy into the DBC.

Both WWMD and DPHE publish their requirements, and are available via the internet. These City entities are the subject matter experts for grease interceptors, and have established these requirements based on physical, environmental and customary characteristics that are specific to the City and County of Denver.

Please note that I have coordinated with WWMD, and CPD personnel in the development of this proposal via Denvergov.org e-mail, which is available for review upon request.

Referenced Standards:

- Denver Development Services Wastewater Management Division Sewer Use and Drainage Permit requirements
- Denver Department of Public Health and Environment Rules and Regulations Governing Food Establishments.

Impact:

This will reduce design and construction cost caused by conflicting regulations. There are both more restrictive and less restrictive impacts.
- The effect of the proposal on the cost of construction: □ Increase ☒ Reduce □ No Effect
- The effect of the proposal on the cost of design: □ Increase ☒ Reduce □ No Effect
- Is the proposal more or less restrictive than the I-codes: ☒ More □ Less □ Same

Note: Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

**Departmental Impact:** (To be filled out by CPD staff)

Note: CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of review: □ Increase □ Reduce □ No Effect
- The effect of the proposal on the cost of enforcement/inspection: □ Increase □ Reduce □ No Effect