

ANDREWS MECHANICAL, INC.

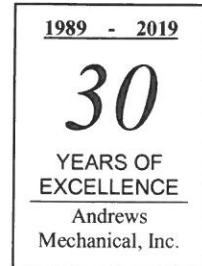
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September 20, 2019

Written Comments Regarding Proposal WAC 51-56-0800 807.3 Air gap removal option in exceptions. Please remove this exception as it would be bad for our citizens. See reasons below and drawings page 3.

- 1) A listed and approved IAPMO air gap is for the purpose of maintaining the dishes that have been sanitized to remain sanitized.
- 2) The purpose of a physical air gap is so the bacteria is not able to get to the sanitized dishes.
 - a. With a physical air gap, if the drain line plugs up and the sink fills up from the blockage, the dishes remain sanitized. Without this air gap the drainage backup could run into the dishwasher and contaminate the dishes, this blockage could happen from another line, above or below the sink, that the sink is hooked to. The blockage could happen during the day or night then go away and you may not notice this had happened at all, or you may not even know this could happen if you don't know how the dishwasher drain system works. Most owners have no clue how the dishwasher line is hooked to the drain system. **But with an approved physical air gap they don't need to know because the contamination will never happen.**
 - b. If the hose doesn't have an approved air gap, the hose allows a pathway for bacteria to travel. Bacteria acts much like a fish going up stream, without a good air gap, it will get there every time.
 - c. The Washington State health code requires all commercial dishwashers, ice machines and vegetable sinks to have the physical air gap because they know what the bacteria can do.
 - d. Have you even seen the kind of black/grey smelly slime that is in your sink drain? It's enough to make you puke. Without the approved air gap this slime would be in direct connection with your dishwasher.

- e. The kitchen sink drain line is hooked right to your toilet drain line that you flush all the waste down the drain. Would you want your clean dishes have direct connection to these drain line? I would not.
- f. Without this approved air gap, you could get sick over and over again, and not even have a clue what is causing the sickness.
- g. We have seen where a commercial ice machine, that did not have an approved air gap, was linked to people getting sick at a restaurant. It has happened in Spokane.

3). I have heard the argument that there is an extra hole required in the countertop for the air gap, extra cost and it doesn't look good. The professional designer is taught at school that function comes before design. Air gaps come in all different designs and colors and have for a long time. Yes, there is extra cost, but it is far less than a trip to the hospital for being sick. Then, having to take off work to get well and then there is all the bad feelings that goes with being sick.

4) Note in Figure 807.4A, the air gap is above the rim of the sink so there is no way the plugged sink slime or bacteria can get into the dishwasher. See, in figure 807.4B, how the air gap is designed with an air gap. Drawings from IAMPO Training Manual.

Edwin "Larry" Andrews II

INDIRECT WASTES

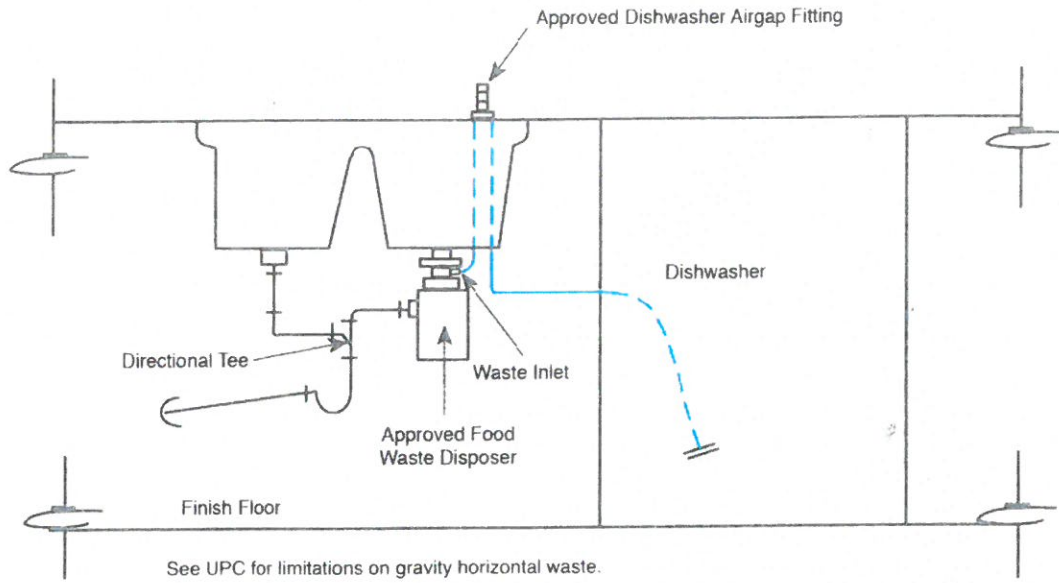


FIGURE 807.4A
DISHWASHER AIRGAP CONNECTION THROUGH DISPOSAL

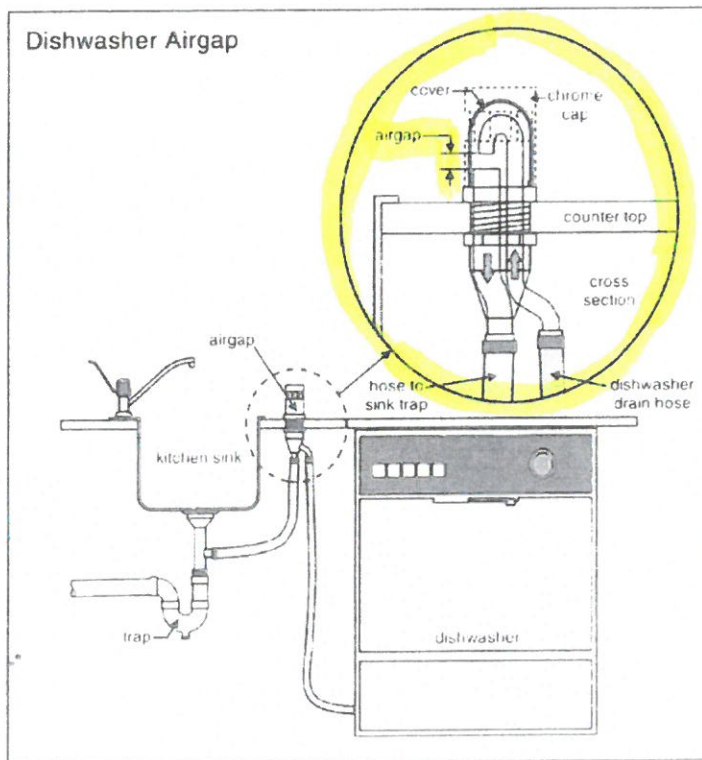


FIGURE 807.4B
DISHWASHER AIRGAP CONNECTION THROUGH SINK TAILPIECE AND AIRGAP FITTING