Kevin Smith Leg Clearance Feedback

20" clearance using 3" legs on counter top equipment.

- 1. In FDA code since at least 1993.
- 2. No indication of the reasoning used to come up with this criterion.
- 3. Does not have issue with recommended changes to NSF standards that are more stringent then the code.

NSF History of the 20" Clearance Requirement for 3" Legs

Was incorporated into the 2002 Revision of Standard 2 because it was reflective of the Food Code:

(2 Draft 3.5.doc, Tracking #2/i1/r3.4)

4.27.5 COUNTER AND TABLE UNITS: Counter and table units shall be sealed to the counter or mounted on legs to provide a minimum unobstructed space beneath the unit of 10 cm (4 in).

5.21 Equipment mounting

- **5.21.1** Floor-mounted equipment shall be:
 - portable; or
 - mobile; or
 - designed to be sealed to the floor; or
 - elevated on legs that provide a minimum unobstructed clearance of 6.0 in (150 mm) beneath the unit
- 5.21.1.1 If no part of the floor under the floor-mounted equipment is more than 6.0 in (150 mm) from the point of cleaning access, the clearance space may be only 4.0 in (100 mm).
- 5.21.2 Counter-mounted equipment shall be:
 - portable; or
 - designed to be sealed to the counter; or
 - elevated on legs that provide a minimum clearance of 4.0 in (100 mm) beneath the unit.
- 5.21.2.1 The clearance space between the counter and the counter-mounted equipment may be 3.0 in (75 mm) if the horizontal distance of the counter-top is no more than 20 in (50 cm) from the point of access for cleaning.
- 5.21.2.2 The clearance space between the counter and the counter-mounted equipment may be 2.0 in (50 mm) if the horizontal distance of the counter-top under the equipment is no more than 3.0 in (75 mm) from the point of access for cleaning.
- **5.21.3** Portable equipment shall not weigh more than 80 lb (36 kg) and shall not exceed 36 in (90 cm) in any plane.
- **5.21.4** Utility connections on portable equipment and mobile equipment shall be designed to be disconnected without the use of tools or shall be of sufficient length to permit the equipment to be moved for cleaning.

Reason:

Clarification of intent; requirements for legs and feet are covered under 5.22; notes under 5.21.2 are consistent with Food Code requirements; 5.21.4 clarifies that "designed to be readily disconnected" means "designed to be disconnected without the use of tools" for utility connections on portable and mobile equipment.