



# Virginia Restroom Compliance Guide

A comprehensive reference covering federal OSHA requirements, ADA accessibility standards, and Virginia-specific regulations for commercial restroom facilities.

LOYAL FACILITY SERVICES

*For over 45 years, Loyal has helped Virginia businesses navigate restroom compliance requirements. This guide distills what we have learned serving hundreds of commercial facilities across the DMV – so you can stay ahead of inspectors, not scrambling after them.*

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# OSHA Federal Requirements

The Occupational Safety and Health Administration (OSHA) sets baseline requirements under **29 CFR 1910.141** — Sanitation. These apply to all employers in the United States regardless of state.

## Minimum Toilet Facilities

NUMBER OF EMPLOYEES	MINIMUM TOILETS
1 – 15	1
16 – 35	2
36 – 55	3
56 – 80	4
81 – 110	5
111 – 150	6
Over 150	1 additional per 40 employees

## Sanitation Standards

- ❑ Toilet rooms must be separate for each sex unless single-occupancy with locking doors
- ❑ Running water, soap, and hand-drying facilities required at all times
- ❑ Facilities must be maintained in a sanitary condition
- ❑ Employers cannot impose unreasonable restrictions on restroom access
- ❑ Covered waste receptacles required in women's restrooms

**Penalty Note:** OSHA can issue citations with penalties for sanitation violations. Repeat or willful violations carry significantly higher fines.

## ADA Accessibility Standards

The Americans with Disabilities Act requires that public and commercial facilities provide accessible restroom facilities. Key measurements and requirements are outlined below.

### Accessible Stall Dimensions

ELEMENT	REQUIREMENT
Stall width	Minimum 60 inches
Stall depth	Minimum 59 inches (wall-mounted toilet) or 56 inches (floor-mounted)
Door width	Minimum 32 inches clear opening
Side grab bar	42 inches long, 33–36 inches above floor
Rear grab bar	36 inches long, 33–36 inches above floor
Toilet seat height	17–19 inches above finished floor
Flush control	On open side, operable with one hand

### Lavatory Requirements

ELEMENT	REQUIREMENT
Sink rim height	Maximum 34 inches above floor
Knee clearance	27 in. high, 30 in. wide, 19 in. deep
Mirror (above sink)	Bottom edge max 40 inches above floor
Soap dispenser	Within reach range: 15–48 inches above floor
Paper towel dispenser	Within reach range: 15–48 inches above floor
Exposed pipes	Must be insulated or covered

## Virginia–Specific Regulations

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Virginia enforces its own workplace safety standards through the **Virginia Occupational Safety and Health (VOSH)** program, which is at least as stringent as federal OSHA. Additional requirements come from the Virginia Department of Health (VDH) and local building codes.

### VOSH Standards

- ❑ Virginia adopts federal OSHA standards by reference — all 29 CFR 1910.141 requirements apply
- ❑ VOSH conducts its own inspections independent of federal OSHA
- ❑ Penalties may differ from federal schedule
- ❑ Complaints can be filed directly with Virginia DOLI

### Virginia Department of Health — Food Establishments

Restaurants and food-service businesses in Virginia must also comply with the **Virginia Food Regulations (12 VAC 5–421)**, which include:

- ❑ Handwashing sinks must be accessible at all times during operation
- ❑ Soap, disposable towels, or air dryers must be provided at every handwash station
- ❑ Employee restrooms must not open directly into food prep areas
- ❑ Handwashing signage required in employee restrooms
- ❑ Facilities must be cleaned and maintained on a documented schedule

### Virginia Uniform Statewide Building Code (USBC)

- ❑ New construction and renovations must meet IBC plumbing fixture counts
- ❑ Accessibility requirements follow the Virginia Construction Code, which references ICC A117.1
- ❑ Local building officials conduct inspections and enforce compliance

## Recommended Inspection Frequency

There is no single mandated frequency – the right schedule depends on facility size, traffic, and industry. Use these guidelines as a starting point.

FACILITY TYPE	DAILY	WEEKLY	MONTHLY	QUARTERLY
Office (under 50 employees)	Supply check	Deep clean	Full audit	ADA review
Office (50+ employees)	2x supply check	Deep clean	Full audit	ADA review
Restaurant / food service	Every 2 hours	Deep clean	Full audit	Health dept. prep
Retail / public-facing	Every 4 hours	Deep clean	Full audit	ADA review
Warehouse / industrial	Supply check	Deep clean	Full audit + OSHA	ADA review
Healthcare	Every 2 hours	Deep clean	Full audit	Compliance review

**Best Practice:** Document every inspection. A consistent paper trail is your best defense during a regulatory audit or liability claim.

# Top 5 Compliance Violations

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Based on common OSHA citations and VDH inspection findings, these are the issues we see most frequently in commercial facilities across Virginia.

## 1. Inadequate or Empty Soap Dispensers

OSHA requires soap at every handwash station. Empty dispensers are one of the most commonly cited violations — and one of the easiest to prevent with a managed supply program.

## 2. Missing or Broken Grab Bars

ADA-required grab bars in accessible stalls are frequently missing, loose, or improperly positioned. This creates both a compliance risk and a liability exposure.

## 3. Insufficient Toilet Count

As headcount grows, facilities often fail to add toilets. The OSHA ratio table is clear — and inspectors will count heads against fixtures.

## 4. No Documented Cleaning Schedule

VDH food establishment inspections frequently cite the absence of a documented restroom cleaning schedule. Even if cleaning occurs, without a log, you cannot prove compliance.

## 5. Restroom Access Restrictions

OSHA has issued guidance that employers cannot impose unreasonable restrictions on restroom access. Policies requiring supervisor approval or limiting break times have been cited.

**Don't Wait for an Inspection.** Proactive compliance is always less expensive than remediation after a citation. A managed hygiene partner can eliminate the most common violations entirely.



## Let Us Handle Compliance

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Loyal Facility Services provides managed restroom supply and hygiene programs for commercial facilities across Virginia, Maryland, and Washington, D.C.

Schedule a free hygiene consultation and facility walk-through. We will identify compliance gaps and recommend a program tailored to your facility.

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