



United States  
**Consumer Product Safety Commission**

August 18, 2022

Ms. Genevieve Lynn  
Program Director of Standards & Technical Services  
Pool and Hot Tub Alliance  
2111 Eisenhower Ave  
Alexandria, VA 22314

Dear Genevieve:

U.S. Consumer Product Safety Commission (CPSC) staff recognizes the importance of layers of protection to reduce pool and spa drain entrapments. The Virginia Graeme Baker Pool and Spa Safety Act (VGBA) requires installation of certified drain covers for single blockable drains in public pools, plus a secondary system. Secondary systems, including the safety vacuum release systems (SVRS), shall “meet the requirements of any ASME/ANSI or ASTM performance standard if there is such a standard for such a device or system, or any applicable consumer product safety standard.” VGBA lists both ASME/ANSI A112.19.17 and ASTM F2387 as standards for the SVRS. SVRS devices detect the changes in pump suction pressures that may indicate the entrapment of a bather.

Staff’s concern is the functioning of SVRS devices with pumps that are now required to meet the Department of Energy (DOE) rule, Energy Conservation Program: Energy Conservation Standards for Dedicated-Purpose Pool Pumps, which became effective on July 19, 2021. The DOE rule applies to the range of pool pump sizes typically found in residential and some commercial installations. Variable speed pumps (VSP) are more likely to comply with the new requirements, because they can be operated at higher energy efficiencies than the single-speed pumps typically installed in pool and spa circulation systems. However, in normal operation, a VSP can lower suction pressure such that current SVRS technologies may not differentiate between the pressure change due to pump operation and that from the entrapment of a bather on a drain. The lack of a requirement that an SVRS device operate with a VSP installed may put bathers at risk.

Regarding the VGBA, the public interest is served when the secondary systems keep pace with technology. ASTM F2387-21 was updated in May 2021, and it includes new test requirements for systems with variable speed pumps. ASME A112.19.17 – 2010(R2018) was reaffirmed in 2018, but it has not been technically updated since 2010. The Pool and Hot Tub Alliance (PHTA) standard writing committee, PHTA-17 SWC, has worked over the past several years to amend and adopt the ASME A112.19.17 standard. CPSC staff is aware that PHTA-17 SWC last met in 2017, however, discussions at that time did not include variable speed pumps. PHTA has indicated that work on a PHTA-17 standard continues.

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CPSC staff respectfully requests that PHTA-17 SWC actively continue their work on the development of the SVRS standard, including addressing variable speed pumps, and we also ask that CPSC staff be informed of upcoming meetings so that staff can participate in this important process.

Sincerely,

Mark Eilbert  
Mechanical Engineer  
Directorate for Laboratory Sciences

cc: Jacqueline Campbell, Voluntary Standards Coordinator