

September 21, 2021

TRANSMITTED VIA EMAIL

Susan J. Hilaski
Senior Director, Standards
Pool & Hot Tub Alliance
2111 Eisenhower Ave., Ste. 500
Alexandria, VA 22314

Dear Ms. Hilaski:

This letter responds to your email dated April 26, 2021, in which you request that CPSC approve the Pool and Hot Tub Alliance's (PHTA) provisional amendment (PA) to ANSI/APSP/ICC-16 2017, *American National Standard for Suction Outlet Fitting Assemblies (SOFA) for Use in Pools, Spas, and Hot Tubs* (APSP-16 2017).¹ The PA adds a definition of a "Storable Pool Integral SOFA" and subjects the SOFA to requirements similar to the requirements for self-contained spa SOFAs. The PA expires 2 years after the approval date, according to ANSI rules.

The APSP-16 2017 standard is the voluntary standard for pool and spa SOFAs² that was incorporated by reference into the Virginia Graeme Baker Pool and Spa Act (VGBA) on May 24, 2021. The VGBA provides that if a successor drain cover standard is proposed and the Commission determines the successor standard is in the public interest, the Commission must incorporate the revised standard into the mandatory drain cover standard. The VGBA requires that public pools have a drain cover compliant with APSP-16 2017 and that any single drain, other than an unblockable drain, must have a secondary entrapment prevention system. Multiple drains can be exempted from the secondary system requirement, if they are installed such that the suction from the pump is shared among connected drains and the drains cannot be blocked at the same time.

As you have described, the intention of the PA is to "address the unique circumstances involving the distribution of storable pool integral Suction Outlet Fitting Assemblies not addressed in the ANSI/APSP/IC C-16 2017" standard. Your concern appears to be that APSP-16 2017 does not have requirements for dual SOFAs that are integrated into storable pools. However, although the PA includes testing requirements, CPSC staff notes that the PA lacks requirements for the placement of dual SOFAs in the manufactured storable pool to ensure that they cannot both be blocked at the same time.

¹ The contents of this letter are those of the CPSC staff and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

² A Suction Outlet Fitting Assembly includes all components, including a drain cover and a sump, to transfer water from the pool or spa to the suction piping system.

In your request, a “storable pool” is described as a flexible pool structure that can be disassembled. The storable pool includes a “storable pool pump, piping, and installed Integral SOFA intended only for the pool kit.” Two SOFAs with drain covers are installed into the kit in pairs. In APSP-16 2017, manufactured SOFAs have requirements that include: testing for hair and body entrapment on a single SOFA, markings that include the approved flow rate, and instructions for installation and replacement. The PA adds requirements to APSP-16 2017, including testing two storable pool SOFAs together.

The PA adds storable pool SOFAs into the test method for hair entrapment of self-contained spa drains in section 5.6 of APSP-16 2017, in which self-contained spa drains are tested in pairs. However, APSP-16 2017 also requires that self-contained spa drains that are distributed only as a part of manufactured spas are certified in conformance with UL 1563,³ which has requirements for placement of multiply drains in a manufactured spa. As you are aware, the placement of dual drains affects the body entrapment potential of blocking both drains at the same time. In UL 1563, dual drains must be 3 feet apart or on separate planes to prevent entrapment. The PA does not include similar requirements for the installation of the dual storable pool SOFAs within the storable pool, to ensure that both drains cannot be blocked at the same time. Staff recommends further work on this standard to address the issues noted.

Thank you for engaging with CPSC concerning your proposed change to APSP-16 2017. CPSC staff looks forward to continued engagement with PHTA regarding the VGBA and improvements to pool drain entrapment prevention measures. If you have any questions or comments, please contact me.

Sincerely,

Mark Eilbert

Mark Eilbert

VGBPSSA Technical Lead

cc: voluntarystandards@cpsc.gov

³ UL 1563 *Electric Spas, Equipment Assemblies, and Associated Equipment*