



UNITED STATES
CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, DC 20207

Memorandum

April 2, 2012

TO : DeWane Ray, Assistant Executive Director, Office of Hazard Identification and Reduction

FROM : Perry Sharpless, Project Manager - Pools and Spas, Directorate for Laboratory Sciences

SUBJECT : Correction to memorandum dated March 30, 2012, regarding the summary of public comments received regarding revocation of the definition of unblockable drain covers

The memorandum sent to the Commission on March 30, 2012, included three anomalies that occurred during translation of the document from a Word file to a PDF format. In each case, the inch symbol (") was overstruck onto the number to which it applied. For accuracy, the inch symbol has been replaced by the word "inch" in each of the three corrected instances below.

1. The indented paragraph on page two of the memo should read:

A suction outlet defined as all components, including the sump and/or body, cover/grate, and hardware such that its perforated (open) area cannot be shadowed by the area of the 18 inch x 23 inch Body Blocking Element of ASME/ANSI A112.19.8 – 2007 and that the rated flow through the remaining open area (beyond the shadowed portion) cannot create a suction force in excess of the removal force values in Table 1 of that Standard. All suction outlet covers, manufactured or field-fabricated, shall be certified as meeting the applicable requirements of the ASME/ANSI A112.19.8 standard.

2. The paragraph at the top of page three of the memo should read:

convert a blockable drain (one that can be shadowed by the area of the 18 inch x 23 inch body-blocking element (BBE) into an unblockable drain by the addition of a large "unblockable" cover. The revocation did not alter the requirement that public pools and spas be in compliance with the VGBA, which became effective on December 19, 2008. For public pools or spas that required *modifications* as a result of the revocation, the compliance date was set at May 28, 2012.

3. The paragraph at the top of page 7 of the memo should read:

entrapment device. It was suggested that the Commission identify what methods are acceptable and provide illustrations of compliant systems. It was also suggested that the Commission establish a system to respond to inquiries about proposed system designs/modifications. There was also a suggestion to develop a material/life span sheet for outlet covers to ensure the cover material properties are appropriate for the pool environment and product life. The same commenter suggested guidance for certain size covers (24 inch x 24 inch and 3 inch x 31 inch) regarding the classification as “unblockable.”