

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH



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EHS Circular Letter 2013-20

TO: Directors of Health/Districts
Chief Sanitarians

FROM: Pamela E. Scully, Sanitary Engineer 3, Recreation Program

DATE: March 28, 2013

SUBJECT: Public Pool Main Drain Updates

MAIN DRAIN COVERS:

When the Virginia Graeme Baker Pool and Spa Safety Act (VGB) went into effect on December 19, 2008, CT's public pools complied by replacing their existing main drains. Please note the manufacturers of VGB compliant main drain covers recommend that the **covers** be periodically replaced. This is mainly due to UV degradation. Listed below are the most common manufacturers of main drains used in Connecticut and their general recommended cover replacement date.

<u>MANUFACTURERS NAME</u>	<u>GENERAL RECOMMENDED REPLACEMENT DATE</u>
AquaStar	5 Years
Hayward	7 Years
Lawson Aquatics (Neptune Benson)	10 Years
Paramont (MDX/SDX)	5 Years
Pentair (Sta-Rite)	7 Years
Waterways	7 Years

During the annual inspections of public pools within your jurisdiction, we suggest that you inform pool owners of the need for the periodic replacement of the main drain cover. Please ask pool owners to check the web site for the applicable company to confirm the recommended replacement date. In addition to the general dates listed above, specific dates for Hayward covers can be found in their VGB Certificate of Compliance, specific dates for the Waterway covers are listed in their owner's manual, and specific dates for Lawson Aquatic as well as Pentair, on the actual main drain cover. Please also inform pool owners that the replacement of a main drain cover needs to be completed by a licensed pool contractor.



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As replacement of a main drain cover is a manufacturer recommendation, rather than a directive from the Consumer Product Safety Commission (CPSC), we are not requesting that you close pools that fail to replace the main drain cover.

UNBLOCKABLE DRAINS:

The CPSC issued a revised interpretive rule to the VGB Act on the definition of an “unblockable drain” to include the main drain sump and not just the main drain cover. This revised interpretation means that if any public pool has only one “unblockable drain” where the sump is not sized to match the “unblockable drain” cover, the pool is out of compliance with the VGB Act and the pool owner must have installed, by a licensed pool contractor, a secondary anti-entrapment device. The date of compliance for this new interpretive ruling is May 23, 2013 for those that installed these covers on or before October 11, 2011. “Unblockable drain” covers that were installed after October 11, 2011 should already be compliant with the revised interpretation of the VGB Act.

Note: An “unblockable drain” is a drain larger than 18” x 23”. In Connecticut there are very few public pools that installed one “unblockable drain” to comply with the VGB Act. Therefore, this new interpretive rule and its compliance date should not have a significant impact on Connecticut pools. In addition, public pools with larger main drains tend to be gutter pools, with surge tanks, making them a gravity drainage system so a secondary anti-entrapment device is already provided.

cc: Suzanne Blancaflor, M.S., M.P.H., Chief, Environmental Health Section
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