

TEXAS DEPARTMENT OF STATE HEALTH SERVICES



DIVISION FOR REGULATORY SERVICES ENVIRONMENTAL AND CONSUMER SAFETY SECTION POLICY, STANDARDS, AND QUALITY ASSURANCE UNIT PUBLIC HEALTH SANITATION & CONSUMER PRODUCT SAFETY

PUBLIC HEALTH SANITATION & CONSUMER PRODUCT SAFETY REGULATORY CLARIFICATIONS

Date: May 18, 2009

EHPSQAC NO. 001

SUBJECT: Replacement Suction Outlet Covers

Applicable Texas Administrative Code: 25 TAC §265.190(I) – “For post 10/01/99 and pre-10/01/99 pools and spas a replacement cover with stainless steel or brass fasteners (if fasteners are specified by the manufacturer must be kept on site. This subsection does not apply to grates that are 24 inches or larger, measured diagonally.”

Question: Effective December 19, 2008, the Federal Virginia Graeme Baker Pool and Spa Safety Act required all suction outlet covers on public pools to meet the ASME/ANSI A112.19.8 standard. Now, must an extra suction outlet cover with fasteners be kept on site?

Response: The requirement to keep a duplicate suction outlet cover on site is waived if, and only if, the existing cover installed in the pool or spa on or after December 19, 2008 is compliant with both the Virginia Graeme Baker Pool and Spa Safety Act (VGB) and ASME/ANSI A112.19.8-2007 or subsequent standard.

Support:

1. The ASME/ANSI A112.19.8 standard certifies pool suction outlet covers as meeting said standard based on a series of performance tests and evaluations. As part of this testing procedure each cover is tested for tolerance to UV radiation over a period of time. Based on these tests each suction outlet cover has an installation “life expectancy” after which the cover will no longer meet the testing and certification standards and must be replaced.

2. Following passage of VGB there was an extremely limited supply of manufactured suction outlet covers that complied with the ASME/ANSI A112.19.8 standard. This delayed replacement of non-compliant covers. Obtaining the proper suction outlet covers for replacement in a pool or spa was and is difficult due to limited supply.
3. Replacement costs for covers in unusual sizes and for field fabricated covers/grates were and remain high due to many factors which have to do with compliance to ASME/ANSI and VGB.
4. Effective December 19, 2008, VGB prohibits the manufacture, distribution or sale of any non-ASME/ANSI A112.19-2007, or subsequent standard, compliant suction outlet cover.
5. Tracking of VGB compliant covers installed “life expectancy” can be tracked by review of pool maintenance records which should be maintained both on site by the pool owner/operator and by the installer.
6. When the current rules became effective, September 2004, suction outlet covers that met the then ASME/ANSI A112.19.8M requirement in the Texas Standards for Public Swimming Pools and Spas were indistinguishable from non-compliant covers. In order to determine if the cover met the State Standards an inspector had to examine certification information on each cover, which could not be done if the cover was installed in a pool. Thus the rules required that a duplicate suction outlet cover remain available on site for confirmation of compliance to both rule and the ASME/ANSI A112.19.8M standard and to facilitate replacement if a cover was broken, missing or loose.

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