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ADVISORY NOTICE

PLAN REVIEW REQUIREMENTS FOR MODIFICATIONS MADE TO PUBLIC SWIMMING POOLS TO COMPLY WITH THE FEDERAL VIRGINIA GRAEME BAKER ACT

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This letter is an advisory to public swimming pool owners regarding plan review requirements for modifications made to comply with the Federal Virginia Graeme Baker Pool and Spa Safety Act (VGB Act). The Consumer Product Safety Commission is the regulatory authority that is responsible for enforcing the requirements of the federal VGB Act. FHD will not enforce the standards of the Act locally unless the California state law is amended; however, the Department of Environmental Health Food and Housing Division (FHD) will continue to **require plan check approval** when pools are renovated or when modifications are made, such as:

- *The plumbing is split for installation of dual main drains.*
- *The installation of an unblockable drain or channel drain.*
- *The installation of pumps, filters, plumbing and disinfectant devices, or other equipment that impacts the circulation and disinfection of the public swimming pool.*
- *Resurfacing the pool shell and/ or modifying ancillary facilities (i.e. fencing, decks, restrooms, etc.)*

FHD strongly recommends that pools constructed with a single main drain be refitted with dual (split) main drains or an unblockable drain or channel drain with approved anti-entrapment drain covers. In these cases, the swimming pool or spa shall have at least two (2) circulation drains per pump that shall be hydraulically balanced and symmetrically plumbed through one or more "T" fittings. The drain shall be separated by a distance of at least three feet in any dimension between each drain.

FHD will **not require plan check approval**, but should be *notified* in the following cases:

- *Installation of a Safety Vacuum Release System (SVRS) on pools with a single main drain.* In these cases, the owner and operator are advised to ensure these devices are properly installed, maintained and tested in accordance with the manufacturer's instructions. It is anticipated that state law may change and only allow the anti-entrapment options described above.
- *Installation of approved anti-entrapment drain covers on pools that have split main drains with three feet separation with sumps.* Each anti-entrapment cover must be sized to the pump capacity and professionally secured to the existing plaster ring with stainless steel screws. Provide the pump capacity and drain cover make and model or type of Safety Vacuum Release System installed as applicable when contacting the plan check unit. The pool owner shall keep the Certificate of Compliance that comes with the approved drain cover.

The FHD also advises pool owners and operators to ensure that contractors making modifications to any public swimming pool have a proper, valid California state contractor's license applicable to the work that is being conducted before any structural modifications are made to the pool. Permanently disabling or plugging up the main drain is not an option allowable under current state codes.

To contact the Plan Check Unit, please call (619) 338-2365.

"Environmental and public health through leadership, partnership and science"

Compliance Decision Tree for VGB ACT

