

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. CDPH 01/10
2nd. 45-Day Comment Period

PARTICIPATION COMMENTS FOR THE NOTICES DATED JULY 19, 2011
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: AUGUST 29, 2011

Date: September 1, 2011

From:

Lynne Simnick
Name (Print or type)

(Signature)

The IAPMO Group

Agency, jurisdiction, chapter, company, association, individual, etc.

4755 East Philadelphia Street Ontario CA 91761
Street City State Zip

I/We (do)(**do not**) agree with:

The Agency proposed modifications As Submitted on: CBC Chapter 31B (Public Swimming Pools)

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

See Attachment A.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

We have identified a few inconsistencies between DPH's proposed public swimming pool standards and provisions contained in the California Plumbing Code and California Mechanical Code. Health & Safety Code section 18931 requires the Commission to "[r]esolve conflict, duplication, and overlap in building standards in the code" and "[e]nsure consistency in nomenclature and format in the code." In addition, The very first of the nine point criteria set forth in Health and Safety Code section 18930, subdivision (a) states "(1) The proposed building standards do not conflict with, overlap, or duplicate other building standards."

In addition, we note that the proposed reference to ASME/ANSI A112.19.8 is out of date. This standard is no longer being updated and has been replaced by APSP 16, Suction Fittings for Use in Swimming Pools, Wading Pools, Spas, and Hot Tubs.

In Attachment A, we identify the inconsistencies and provided suggested changes. We also provide a brief note under each of our suggested changes more precisely identifying the rationale for the proposed change.