



*The Association of  
Pool & Spa Professionals®*

REFLECT SUCCESS

---

**Unblockable Pool and Spa Drain Covers  
(suction fittings)  
CPSC Sept. 28, 2011 Vote**

**FAQ**

**1. What was this vote about?**

On September 28, 2011, the Consumer Product Safety Commission voted to revoke a prior "interpretive rule" which had defined an unblockable drain, a term used in the Virginia Graeme Baker Pool and Spa Safety Act (VGBA). The interpretative rule defined "unblockable drain" to include the drain cover, meaning that a small suction fitting (drain) with an unblockable cover which fit into a smaller, blockable sump would be classified as unblockable. As a result of the September 28 vote, the definition of an unblockable drain will revert to the language in the Definition Section of the VGBA and will include the sump, but not the suction fitting or drain cover. Hence, a large unblockable drain cover over a smaller blockable drain cannot be used to create an unblockable drain.

**1.1 What is an unblockable drain?**

An unblockable drain is a sump that cannot be completely shadowed on an 18" x 23" rectangle. For example an 18" x 18" sump is considered "blockable" while a 24" x 24" sump is considered "unblockable."

**2. What does this vote mean?**

Under the VGBA, public pools that have a single drain that is not unblockable must install one or more additional devices, such as an SVRS, automatic pump shut off, gravity drainage system or suction limiting vent system. A pool with an unblockable drain is exempt from these additional requirements. As a result of this vote, public pools and spas that have a single large unblockable drain cover over a smaller blockable drain will be required to install one or more of these secondary devices.

**3. How does this vote affect existing public pools?**

Existing public facilities which have a single unblockable drain cover over a smaller blockable drain are no longer considered to be in compliance with the public pool requirements of section 1404(c) of the VGBA unless they have installed one or more of these additional devices.

#### **4. What is the deadline for compliance for existing pools?**

The CPSC is contemplating a compliance date of May 28, 2012. The Commission has established a 60 day comment period for affected parties to provide input as to the feasibility of this compliance date. APSP will soon provide instructions for submitting comments to APSP Senior Director, Technical & Standards, Carvin DiGiovanni at [cdigiovanni@apsp.org](mailto:cdigiovanni@apsp.org).

#### **5. Does this vote and revised ruling affect channel drains and other typical unblockable drains?**

Channel drains or other suction fittings/drain covers which cannot be shadowed by an 18" x 23" rectangle and have been tested and listed "For single outlet use" under the ANSI/APSP-16 2011 Standard and which fit over a sump of the same or unblockable size are not affected by this vote or ruling and are still considered unblockable. As stated by the Commission in a September 30, 2011 announcement:

"Again, this message only affects public pools and spas that used CPSC's 2010 interpretation to install an unblockable sized drain cover over a blockable sized single main drain, without adding a back-up system or device..."

#### **6. Does this rule require the use of SVRS devices on public pools?**

No. Public pools which have a multiple main drain system at least three feet apart or a single unblockable drain as that term is now defined are still not required to install any additional devices. Pools with a single drain that is NOT unblockable must choose from the list of additional devices cited in Section 1404(c)(ii) and in question 2 above if they have not already installed a recognized secondary anti-entrapment device/system. An SVRS is one of several options provided in this section.

#### **7. Do covers affected by this new rule have to be removed from public pools?**

No. There is no reason to replace the covers. Pools and spas that have a single drain of the type described above must now install one of the permitted additional devices. As stated by the commission in its September 30, 2011 announcement:

"It is very important for the pool and spa industry to be aware that CPSC is not saying that unblockable sized drain covers should be removed from facilities that installed them on small single main drains. Rather, the Commission is directing pool and spa operators to add a back-up system or device. The Commissioners and the staff, in fact, recognize that unblockable sized drain covers are an advance in pool safety. Yet, layers of protection are an important principal that the VGB Act promotes."

#### **8. Does this vote affect smaller drain covers?**

Drain covers which were not listed as unblockable are not affected in any way.

**9. Does this vote affect existing residential pools/spas?**

No

**10. How do I obtain more information with regard to the CPSC vote?**

The deliberations of the Commission took place on September 28, 2011. The webcast is posted at <http://www.cpsc.gov/webcast/previous.html> as Part 1 of the September 28, 2011 webcast. To go directly to the webcast, visit [www.cpsc.gov/vnr/asfroot/cm09282011\\_1.asx](http://www.cpsc.gov/vnr/asfroot/cm09282011_1.asx). For more information with regard to a specific unblockable drain cover that you may have, contact the manufacturer.

**11. How do I make sure that I protect against all forms of entrapment?**

The ANSI/APSP-7 Standard for Suction Entrapment Avoidance in Swimming Pools, Wading Pools, Spas, Hot Tubs, and Catch Basins addresses all aspects of suction outlet safety. The APSP Field Checklist also provides helpful solutions for all configurations. The Standard and the Field Checklist are available at [www.APSP.org/Store](http://www.APSP.org/Store).

**12. What will APSP do to represent members and the public on this reinterpretation of an "unblockable drain"?**

APSP has begun to solicit feedback from members during the 60-day public comment period for affected parties. APSP will soon provide instructions for submitting comments to APSP Senior Director, Technical & Standards, Carvin DiGiovanni at [cdigiovanni@apsp.org](mailto:cdigiovanni@apsp.org). APSP will continue to support the most safe and common sense approach which is backed by consensus standards that provide clear direction for industry while protecting the health and safety of consumers. The ANSI/APSP-7 Standard for Suction Entrapment Avoidance in Swimming Pools, Wading Pools, Spas, Hot Tubs, and Catch Basins, as well as the APSP Field Checklist, remain the best tools for industry to follow to protect consumers. They both are available at [www.APSP.org/Store](http://www.APSP.org/Store). Members can expect periodic updates on the CPSC decision, as well as calls to action when necessary.