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California Department of Public Health



ARNOLD SCHWARZENEGGER
Governor

August 8, 2008

TO: Local Health Officers
Directors of Environmental Health

FROM: Environmental Management Branch

SUBJECT: VIRGINIA GRAEME BAKER POOL AND SPA SAFETY ACT

In December 2007, the President signed into law the Virginia Graeme Baker Pool and Spa Safety Act. The purpose of the Act is to increase the safety of swimming pools and spas by 1) requiring the use of proper devices, such as anti-entrapment drain covers and fences/barriers, through the establishment of a grant incentive program in order to encourage states to enact comprehensive pool and spa laws; 2) educating the public about drowning prevention; 3) establishing a federal swimming pool and spa drain cover standard; and 4) ensuring public pools are equipped with proper safety devices.

The Act requires that all swimming pool and spa drain covers manufactured, distributed, or entered into commerce in the United States conform to the entrapment protection standards of the American Society of Mechanical Engineers/American National Standards Institute (ASME/ANSI) A112.19.8-2007 standard, or any successor standard.

For public swimming pools and spas, the Act requires that each pool and spa be equipped with anti-entrapment devices or systems that comply with the ASME/ANSI A112.19.8-2007 standard, or any successor standard. The Act further requires that public swimming pools and spas with a single main drain other than an unblockable drain be equipped, at a minimum, with one or more of the following devices or systems designed to prevent entrapment by pool or spa drains: 1) a safety vacuum release system, 2) a suction-limiting vent system, 3) a gravity drainage system, 4) an automatic pump shut-off system, 5) a drain disablement device or system, and/or 6) any other system determined by the Consumer Product Safety Commission (CPSC) to be equally effective as, or better than these systems at preventing or eliminating the risk of injury or death associated with pool drainage systems. The Act requires that any device or system must meet the requirements of any ASME/ANSI or ASTM International (ASTM) performance standard if there is such a standard for such a device or system, or any applicable consumer product safety standard.

These new standards become effective on December 19, 2008. Each public swimming pool and spa, both old and new, must be equipped with anti-entrapment drain covers that meet the ASME/ANSI A112.19.8-2007 standard. Furthermore, each public swimming pool and spa with a single main drain other than an unblockable drain must also be equipped with a device or system designed to prevent entrapment as described above.

Recently, CPSC staff prepared a detailed interpretation of the Act. A copy of the Act and the CPSC interpretation are enclosed. In addition, CPSC recently advised the California Department of Public Health that they are willing to respond to inquiries regarding the implementation of the Act and other technical or engineering issues. If any local officials or pool service/installation companies need clarification on technical/engineering issues, they can call Troy Whitfield of CPSC at (301) 504-7548.

California Public Swimming Pool Requirements

California Health and Safety Code

At <http://www.leginfo.ca.gov/calaw.html>

- Section 1797.182
- Sections 116025-116068
- Sections 115920-115927 (Residential pools)

California Code of Regulations

At <http://www.calregs.com/linkedslice/default.asp?SP=CCR-1000&Action=Welcome>

- Sections 65501-65551

California Building Code

At <http://www.calregs.com/linkedslice/default.asp?SP=CCR-1000&Action=Welcome>

- Sections 3101B-3137B.2

Virginia Graeme Baker Pool and Spa Safety Act

- [Consumer Product Safety Commission Interpretation](#)

- [Consumer Product Safety Commission Guide to Compliance](#)
- [Consumer Product Safety Commission List of Manufacturers](#)
- [Virginia Graeme Baker Pool and Spa Safety Act](#)
- [CDPH Information Letter](#)

BILL NUMBER: AB 1020 AMENDED
BILL TEXT

AMENDED IN ASSEMBLY APRIL 29, 2009

INTRODUCED BY Assembly Members Emmerson and Ma

FEBRUARY 27, 2009

An act to add Section 116064.1 to the Health and Safety Code, relating to swimming pools, and declaring the urgency thereof, to take effect immediately.

LEGISLATIVE COUNSEL'S DIGEST

AB 1020, as amended, Emmerson. Public swimming pools: anti-entrapment devices and systems.

Under existing law, public wading pools, as defined, are required to equip drain suction outlets with specified anti-entrapment grates to prevent physical entrapment of the bathers. Under existing law, the Swimming Pool Safety Act, public swimming pools are exempted from that act's requirements that newly constructed pools be equipped with specified safety features, including anti-entrapment grates for drain suction outlets.

This bill would require a public swimming pool, as defined, to be equipped with anti-entrapment devices or systems that meet ~~federal requirements~~ ASME/ANSI or ASTM performance standards, as specified . It would also require a public swimming pool with a single main drain that is not an unblockable drain to meet at least one of the specified ~~requirements~~ standards . ~~It~~ The bill would impose ~~time frames~~ timeframes by which ~~the requirements of the bill~~ its requirements must be met. ~~Violation~~

The bill would also specify that any amendments or successors to, or later published editions of, ASME/ANSI or ASTM performance standards relating to anti-entrapment devices or systems would become the applicable standard in California 90 days after publication by ASME/ANSI or ASTM, respectively, provided that the amendments, successors, or later published editions are approved by the department within that 90-day period. The bill would require that if the department approves an amendment or successor to, or later published edition of, a performance standard, the department would be required to adopt and file with the Secretary of State a regulation to that effect.

The bill would require the department to develop, and public swimming pool owners and operators to file, a form to indicate compliance with the requirements of the bill, as specified. The form would be required to include a certification, signed under penalty of perjury, by either a state-licensed contractor or professional engineer that the information provided on the form is true, thereby constituting a violation of the existing crime of perjury.

Violation of ~~these~~ the

requirements of the bill would constitute a misdemeanor.

By creating ~~a~~ new ~~crime~~ crimes, the bill would impose a state-mandated local program.

By imposing new duties on local building officials, the bill would impose a state-mandated local program.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that with regard to certain mandates no reimbursement is required by this act for a specified reason.

With regard to any other mandates, this bill would provide that, if the Commission on State Mandates determines that the bill contains costs so mandated by the state, reimbursement for those costs shall be made pursuant to the statutory provisions noted above.

This bill would declare that it is to take effect immediately as an urgency statute.

Vote: 2/3. Appropriation: no. Fiscal committee: yes.
State-mandated local program: yes.

THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

SECTION 1. Section 116064.1 is added to the Health and Safety Code, to read:

116064.1. (a) As used in this section, the following words have the following meanings:

(1) "ASME/ANSI performance standard" means a standard that is accredited by the American National Standards Institute and published by the American Society of Mechanical Engineers.

(2) "ASTM performance standard" means a standard that is developed and published by ASTM International.

(3) "Main drain" means a submerged suction outlet typically located at the bottom of a swimming pool that conducts water to a recirculating pump.

(4) "Public swimming pool" means any outdoor or indoor structure intended for swimming or recreational bathing that is open to the public generally, whether for a fee or free of charge, open exclusively to members of an organization and their guests, residents of a multiunit apartment building, apartment complex, residential real estate development, or other multifamily residential area, or patrons of a hotel or other public accommodations facility.

(5) "Safety vacuum release system" means a vacuum release system that ceases operation of the pump, reverses the circulation flow, or otherwise provides a vacuum release at a suction outlet when a blockage is detected.

(6) "Unblockable drain" means a drain of any size and shape that a human body cannot sufficiently block to create a suction entrapment hazard.

(b) Any amendments or successors to, or later published editions of, ASME/ANSI or ASTM performance standards relating to anti-entrapment devices or systems shall become the applicable standard in California 90 days after publication by ASME/ANSI or ASTM, respectively, provided that the amendments, successors, or later published editions are approved by the department within 90 days of the publication of the performance standards by ASME/ANSI or ASTM, respectively. Notwithstanding any other law, the adoption of

rules and regulations pursuant to this section shall not be subject to the rulemaking requirements of the Administrative Procedure Act (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code), except that, if the department approves an amendment or successor to, or later published edition of, a performance standard, the department shall adopt and file with the Secretary of State a regulation to that effect.

~~(b)~~

(c) Subject to subdivisions ~~(d) to (f)~~

(e) to (g) , inclusive, every public swimming pool shall be equipped with anti-entrapment devices or systems that comply with ~~the requirements of federal law~~ ASME/ANSI performance standard A112.19.8, as in effect on the date immediately prior to the effective date of this section, or any applicable ASME/ANSI performance standard that has been adopted by the department pursuant to subdivision (b) .

~~(e)~~

(d) Subject to subdivisions ~~(d) to (f)~~

(e) to (g) , inclusive, every public swimming pool with a single main drain that is not an unblockable drain shall be equipped with at least one or more of the following devices or systems that are designed to prevent physical entrapment by pool drains ~~and that meet the federal requirements applicable to that device or system~~ :

(1) A safety vacuum release system that has been tested by ~~an~~ a department-approved independent third party and found to conform to ~~federal requirements~~

ASME/ANSI performance standard A112.19.17, as in effect on the date immediately prior to the effective date of this section, or any applicable ASME/ANSI performance standard that has been adopted by the department pursuant to subdivision (b), or ASTM performance standard F2387, as in effect on the date immediately prior to the effective date of this section, or any applicable ASTM performance standard that has been adopted by the department pursuant to subdivision (b) .

(2) A suction-limiting vent system with a tamper-resistant atmospheric ~~opening~~ opening, provided that it conforms to any applicable ASME/ANSI or ASTM performance standard that has been adopted by the department pursuant to subdivision (b)

(3) A gravity drainage system that utilizes a collector ~~tank~~ tank, provided that it conforms to any applicable ASME/ANSI or ASTM performance standard that has been adopted by the department pursuant to subdivision (b) .

(4) An automatic pump shut-off system tested by a department-approved independent third party and found to conform to any applicable ASME/ANSI or ASTM performance standard that has been adopted by the department pursuant to subdivision (b)

~~(5) A device or system that disables the drain.~~

~~(6)~~

(5) Any other system that is deemed, in accordance with federal law, to be equally effective as, or more effective than, the systems described in paragraphs (1) to ~~(5)~~

(4) , inclusive, at preventing or eliminating the risk of injury or death associated with pool drainage systems.

~~—(d)~~

(e) Subdivisions ~~—(b) and (c)~~

(c) and (d) shall apply to every public swimming pool constructed on or after December 19, 2009.

~~—(e)~~

(f) Commencing December 19, 2009, whenever a construction permit is issued for the alteration of an existing public swimming pool, that public swimming pool shall be retrofitted so as to be in compliance with this section.

~~—(f)~~

(g) A public swimming pool constructed prior to December 19, 2009, shall be retrofitted to comply with subdivisions ~~—(b) and (c)~~ (c) and (d) by no later than December 19, 2011.

(h) *Within 90 days of the effective date of this act, the department shall issue a form for use by owners and operators of public swimming pools to indicate compliance with this section. The department shall consult with county health officers and directors of departments of environmental health in developing the form and shall post the form on the department's Internet Web site. The form shall include, but not be limited to, the following information:*

(1) *A statement of whether the pool operates with a single or split main drain.*

(2) *Identification of the type of anti-entrapment device or system that has been installed and the date of installation.*

(3) *Identification of the type of device or system designed to prevent physical entrapment that has been installed and the date of installation.*

(4) *A signature and license number of either a state-licensed contractor whose license permits the contractor to work on swimming pools and related equipment or a state-licensed professional engineer with experience with public swimming pools who certifies under penalty of perjury that the information provided on the form is true.*

(i) *Each public swimming pool owner or operator shall file a completed copy of the form issued by the department pursuant to this section with the city or county department of environmental health in the city or county in which the swimming pool is located. The form shall be filed within 30 days following the completion of the swimming pool construction or installation required pursuant to subdivisions (e) to (g), inclusive. The public swimming pool owner or operator shall not make a false statement, representation, certification, record, report, or otherwise falsify information that he or she is required to file or maintain pursuant to this section.*

(j) *In enforcing this section, health officers and directors of city or county departments of environmental health shall consider documentation filed on or with the form issued pursuant to this section by the owners and operators of public swimming pools as evidence of compliance with this section. A city or county department of environmental health may verify the accuracy of the information filed on or with the form.*

SEC. 2. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution for certain costs that may be incurred by a local agency or school district because, in that regard, this act creates a new crime or

infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

However, if the Commission on State Mandates determines that this act contains other costs mandated by the state, reimbursement to local agencies and school districts for those costs shall be made pursuant to Part 7 (commencing with Section 17500) of Division 4 of Title 2 of the Government Code.

SEC. 3. This act is an urgency statute necessary for the immediate preservation of the public peace, health, or safety within the meaning of Article IV of the Constitution and shall go into immediate effect. The facts constituting the necessity are:

In order to conform state law with federal requirements for the prevention of drowning, at the earliest possible time, it is necessary that this act take effect immediately.

BILL ANALYSIS

Date of Hearing: May 5, 2009

ASSEMBLY COMMITTEE ON HEALTH

Dave Jones, Chair

AB 1020 (Emmerson) - As Amended: April 29, 2009

SUBJECT: Public swimming pools: anti-entrapment devices and systems.

SUMMARY: Requires a public swimming pool, as defined, to be equipped with anti-entrapment devices or systems that meet federal requirements. Specifically, this bill :

1) Defines the following terms:

- a) American Society of Mechanical Engineers (ASME)/American National Standards Institute (ANSI) performance standard;
- b) ASTM International performance standard (ASTM was originally the American Society for Testing and Materials);
 - c) Main drain;
 - d) Public swimming pool;
 - e) Safety vacuum release system; and,
 - f) Unblockable drain.

2) Requires every public swimming pool that is constructed or permitted to be altered on or after December 19, 2009 to be equipped with anti-entrapment devices or systems that meet ASME /ANSI performance standard A112.19.8, or an ASME /ANSI or ASTM amendment or successor to that standard adopted by the Department of Public Health (DPH). Requires DPH to adopt the amendment or successor to the ASME /ANSI or ASTM performance standard 90 days after the publication, provided DPH approves the amendment or successor. Exempts the adoption of the standards from the Administrative Procedures Act.

3) Requires every public swimming pool constructed or permitted to be altered on or after December 19, 2009 with a single main drain that is not an unblockable drain to be equipped with at least one of the following devices or systems to prevent entrapment and that meet applicable federal requirements:

- a) A safety vacuum release system that has been found by a DPH-approved independent third party to conform to specified standards;
- b) A suction-limiting vent system with a tamper-resistant atmospheric opening that conforms to standards approved by DPH;

- c) A gravity drainage system that utilizes a collector tank that conforms to standards approved by DPH;
 - d) An automatic pump shut-off system tested by a DPH-approved independent third party and found to conform to specified standards adopted by DPH;
 - e) Any other system that is deemed, in accordance with federal law, to be at least as effective as the systems described in 3) a) through 3) d) above at preventing or eliminating the risk of injury or death associated with pool drainage systems.
- 4) Requires public swimming pools constructed before December 19, 2009 to be retrofitted to comply with the above requirements no later than December 19, 2011.
- 5) Requires DPH to consult with county health officers and directors of departments of environmental health to develop a form for use by public swimming pool owners and operators to indicate compliance with this bill (compliance form). Requires DPH, within 90 days of the effective date of this bill, to post the compliance form on its Internet Web site. Requires DPH to include on the compliance form the following elements:
- a) Statement of whether the pool operates with a single or split main drain;
 - b) Identification of the anti-entrapment device or system and the date of installation;
 - c) Identification of the type of device or system designed to prevent physical entrapment and the date of installation; and,
 - d) Signature and license number of either a state-licensed contractor or professional engineer experienced with public swimming pools who certifies, under penalty of perjury, that the information on the form is true.
- 6) Requires each swimming pool owner or operator to file, within 30 days of completion of the swimming pool construction or installation of safety equipment as required by this bill, a completed copy of the compliance form with the local department of environmental health.
- 7) Requires health officers and directors or local environmental health departments to consider documentation on, or filed with, the compliance form to be evidence of compliance, and authorizes local environmental health departments to verify the accuracy of information filed on the form.
- 8) States this bill is an urgency statute necessary to conform with federal requirements for the prevention of drowning and would take effect immediately upon enactment.

EXISTING LAW :

- 1) Under the federal Virginia Graeme Baker Pool and Spa Safety Act (VGB Act), requires, beginning December 19, 2008, every public pool and spa to have an approved anti-entrapment drain cover. Requires a public pool or spa with a single main drain (other than an unblockable drain) to have a device or system designed to prevent entrapment, such as a safety vacuum release system.
- 2) Requires operators of public swimming pools to operate public swimming pools in a sanitary, healthful, and safe manner.
- 3) Authorizes DPH to supervise sanitation, healthfulness, and safety of public swimming pools. Requires DPH to enforce building standards related to public swimming pools and to make and enforce regulations as it deems proper.
- 4) Requires health officers to enforce DPH regulations and building standards related to public swimming pools and to review plans for proposed public swimming pools. Authorizes health officers and DPH inspectors to enter all parts or premises of public swimming pools to enforce compliance with State Building Standards and Health and Safety Codes and DPH regulations.
- 5) Specifies criteria for the safe operation of public swimming pools, such as for underwater lighting systems.
- 6) Requires new and altered public wading pools to have at least two circulation drains per pump located at least three feet apart and to comply with other safety requirements to prevent physical entrapment or suction injury.

FISCAL EFFECT: This bill has not been analyzed by a fiscal committee.

COMMENTS :

1) PURPOSE OF THIS BILL. According to the author, drowning is the second leading cause of accidental death among children ages one to fourteen in the United States (U.S.). The author reports that from 1997-2007, the U.S. Consumer Product Safety Commission (CPSC) received reports of 74 entrapment incidents that resulted in nine fatalities and 63 injuries (two incidents caused no injuries); 54 of these incidents involved children age fourteen and under. Entrapment can occur when a person's body attaches to a drain or vacuum line due to the suction of the water circulation system of a pool or spa, or a limb is inserted or caught in a drain with a broken or missing cover. Death or injury can result when the force of the suction overcomes a person's ability to break free of the drain. The author states this bill is needed because California law is not consistent with new federal safety standards which were adopted to prevent injuries and drowning associated with entrapment in public swimming pools and spas.

The author states that although recent changes in federal law require public pools and spas to have federally-approved anti-entrapment drain covers, current state law requires only that wading pools, new pools, or pools being renovated have these covers. Existing state law is also inconsistent with the federal requirements in terms of the device or system designed to prevent entrapment, such as a safety vacuum release system. In addition, the author states the new federal standards will be enforced by local health jurisdictions; however, enforcement is not

consistent throughout California, with some local health jurisdictions stating that the federal standards cannot be enforced at the local level until state law is amended. This bill adopts the new federal safety standards and allows local health officers to enforce the requirements.

2) BACKGROUND . The CPSC studied circulation entrapment incidents associated with pools, spas, hot tubs, and whirlpools that were reported from 1999 through 2007. Of the 74 incidents, 37 occurred among children five to fourteen years old, inclusive, and eight of the nine fatalities occurred in the same age range. CPSC reports there are five types of circulation entrapment: body, limb, evisceration/disembowelment, hair, and mechanical (clothing, jewelry, or appendages are caught in an outlet cover). It is worth noting that CPSC counts incidents that were reported to CPSC, and probably do not capture all entrapment incidents occurring in a given time period. CPSC estimated that nationally from 2005 to 2007, an average of 2,700 children per year were treated in emergency departments for pool submersions. About 39% of these injuries were serious enough to require hospitalization. Data on circulation entrapment incidents in California are not readily available; the closest available data count drownings (fatal) and hospitalized near-drownings (non-fatal). In California in 2006, according to the DPH EPICenter, 89 children age fourteen and under drowned unintentionally; 78 of these were under ten years old. More California children between one and four years old die by drowning than by any other unintentional injury. An additional 279 children age fourteen and under were hospitalized for submersions or near-drownings; 257 of those children were under ten. Although most submersion incidents are not fatal, many result in lifelong disability. The proportion of these submersions attributable to circulation entrapments is unknown.

3) LOCAL IMPLEMENTATION . According to the California Apartment Association (CAA), there is a "complete lack of consistency across the state in determining what steps are necessary to comply." CAA further writes there is no clear approval process concerning the installation of new anti-entrapment devices, and in many cases, pools are being closed. CAA provides numerous examples of confusion and inconsistent implementation at the local level, as well as long delays in issuance of permits and some cities charging nearly \$1,000 for permit and inspection fees. A February 2009 article in the Orange County Register (Register) also reports that pools and spas across Orange County and the nation are being closed, drained, and retrofitted in order to comply with the VGB Act, even though the required fixes may be simpler and cheaper.

According to the article, the Los Angeles County Department of Public Health (LADPH) generated controversy because its interpretation of the VGB Act was that all public pools must have two drains. Several organizations expressed concern over LADPH's interpretation of the Act, stating that pool operators were being required to drain pools to implement a fix (installing a new drain) that could cost up to \$15,000 per pool, when a \$150 solution is available. According to the Pool Safety Council, LADPH subsequently changed its requirements and now permits divers to install drain covers and anti-entrapment devices.

The Register article notes that Orange County does not interpret the Act as requiring two drains, although that is an option. The Register article also reports that apartment complexes and homeowners associations have been closing pools on the advice of lawyers, although Orange

County is not ordering the closures, as it has no enforcement power over the federal rules. An April 2009 article in the San Jose Mercury News (Mercury) reports local authorities have little enforcement power. The Mercury article also raises the question of the availability of drain covers to meet the demand caused by the VGB Act, and reports that retrofits can cost from \$500 to \$6,500, and most require draining pools or hiring scuba-diving repair services to make the repairs without draining the pools. The Pool Safety Council reports that it has investigated the availability of anti-entrapment drain covers and has found no shortage.

4) SUPPORT. DPH, the sponsor of this bill, writes that California law must be amended because it is currently inconsistent with the new federal requirements, and public swimming pools in California are required to conform to the federal standards. DPH writes this bill will provide for

statewide enforcement of the new standards by local health jurisdictions. The California Association of Realtors writes it supports this effort to make state law consistent with federal law. The California Professional Firefighters, State Council of the International Association of Fire fighters writes in support of a prior version that this bill will enhance the safety of the public. The Pool Safety Council writes it supports this bill but also argues this bill should just codify the VGB Act and not go beyond. The Spa and Pool Education Council (SPEC) writes it urges support of this bill as amended, but also recommends this bill be further amended so that a contractor certifies to the best of his or her knowledge that the information on the compliance form is true. SPEC also recommends a clarifying change on the compliance form.

5) CONCERNS . CAA requests that this bill do the following: a) Simply adopt language that is consistent with the VGB Act; b) Prevent local governments from using the VGB Act to force further technical specifications; c) Prohibit the addition of new building code requirements and property tax reassessments when enforcing this bill; and, d) Prohibit local governments from using the VGB Act as a way of steeply increasing pool inspection fees.

6) PREVIOUS LEGISLATION .

a) AB 2977 (Mullin), Chapter 478, Statutes of 2006, requires new and remodeled pools and spas to provide at least one safety feature from a list of eligible features, adds mesh fences and swimming pool alarms to the list of enumerated drowning prevention safety features, and requires remodeled pools and spas to cover drains with an anti-entrapment grate.

b) AB 2455 (Negrete McLeod) of 2002 would have required remodeled pools to include the safety features required of new pools, increasing the options for safety features and requiring two rather than one feature. AB 2455 also would have required at the sale of a home, the swimming pool be brought into compliance with the pool safety requirements. AB 2455 died on suspense in the Senate Committee on Appropriations.

c) SB 873 (Vasconcellos), Chapter 913, Statutes of 1997, requires public wading pools to have specified characteristics to prevent entrapment and suction injuries, and expands existing law to require all pre-1975 public swimming pools, to be retrofitted with ground fault circuit interrupters.

7) POLICY QUESTION. The VGB Act includes a State Swimming Pool Safety Grant Program for states meeting specified eligibility criteria to hire and train enforcement personnel to assist with implementing the VGB Act, and to educate pool owners and operators and pool construction and installation companies about standards and safety laws. According to a representative of CPSC, the U.S. Congress appropriated \$2 million for this grant program, to be available in fiscal year 2009-10. Should this bill also require DPH to apply for a State Swimming Pool Safety Grant?

8) CLARIFYING AMENDMENTS .

- a) Should this bill specify that public spas and wading pools are included in the definition of a public swimming pool?
- b) The compliance form is required to include identification of the type of "anti-entrapment device or system" and the type of "device or system designed to prevent physical entrapment" that were installed in a public swimming pool. What is the distinction between these terms? The author may wish to clarify. In addition, the author may wish to specify that the compliance form should indicate the conditions under which each type of device or system is required.

REGISTERED SUPPORT / OPPOSITION :

Support

California Department of Public Health (sponsor)
California Association of Realtors
California Professional Firefighters, state council of the International Association of Fire
Fighters
Pool Safety Council
Spa and Pool Education Council

Opposition: None on file.

Analysis Prepared by: Allegra Kim / HEALTH / (916) 319-2097