

Dear Pool Operators,

The Federal Virginia Graeme Baker Pool and Spa Safety Act (VGBA) was updated in 2021. This is the federal rule that is designed to make all swimming “pools” (spas, wading pools, splash pads, etc.) safer. These rules have greatly reduced the number of deaths from entrapment. A very condensed summary of the rules requires:

- 1) Main drain grates that meet the VGBA rules; and
- 2) Install either two drains, set at least 3 feet apart; or an unblockable (32” x 32” or 24”x 24”) drain grate.

How old are your main drain grates? Main drain grates that were installed to meet the VGBA have a maximum life expectancy: usually 3, 5, or 7 years. The life of the grate is printed on the grate, is included on the “Installation Guidelines,” and is determined by the manufacturer. The grates get brittle from exposure to U.V. light and the chemicals in the water. The Federal rules require the grates to be replaced as required by the manufacturer.

Per the Federal VGBA, pool operators must keep on site the manufacturers’ Installation & Operating Instructions (I/O) and the date that the grates were installed. The Oregon Health Authority has instructed all public health specialists to verify this requirement during routine inspections of licensed pools.

#### WHAT YOU NEED TO DO

- a. Find the I/O for the grates currently installed in your vessels, put them in a waterproof sleeve, and hang / store them in the pump room. They need to be accessible to inspectors, maintenance staff, and service operators.
- b. Using the I/O determines the life expectancy of the grates.
- c. Determine the date when the grates were installed at your facility. *Past billings from pool service companies may help you determine this date.*

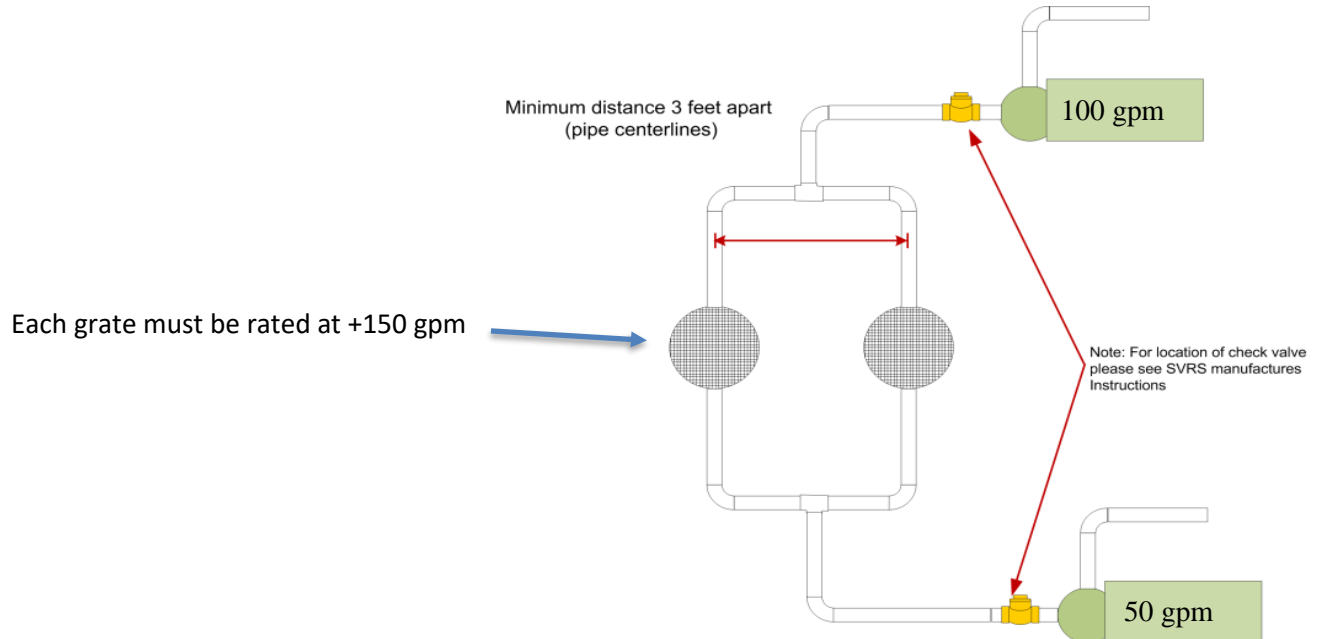
Is your grate still valid? Do you possess the documents to prove it? If you cannot show the life expectancy of the grate and the installation date, your vessel does not meet the VGBA rules, and it is time to start making plans to replace the main drain grates. BE AWARE that grates have a flow rating in gallons per minute (i.e. 75 gpm). This flow rate is stamped on the grate, is listed in the I/O, and is set by the manufacturer. If the existing grates at your vessels are certified by the manufacturer (for example 75 gpm), the new grates you buy must be rated to that same gallon a minute flow rate or higher.

Every morning the operator is required to test and record all the listed tests for “opening” the pool. One of these tests listed on the water quality record sheet is: main drain, or visibility or clarity. This test is required to be conducted when no one is in the water and the water is not agitated (no jets). To check off this box, the pool operator must be able to say “yes” to each of the following three questions:



1. You can see the main drain grate. *This is also a measure of water clarity. The pool can never be opened for swimmer use if you cannot see the bottom of the pool (a swimmer in trouble, debris in the pool).*
2. You can see that the main drain is intact. There are no broken ribs, and the grate is not cracked.
3. You can see that the grate is attached. *There have been drownings when there was no suction through the pipe, but the grate was not attached, and the swimmer got a toe or finger stuck in the exposed pipe.*

Here is a hint to make #3 above more apparent. When you replace the grate, you must use the screws/fitings supplied by the manufacturer (usually stainless steel, don't use anything else but what is supplied). Before you install the screws, color the top of the screw with a bit of brightly colored fingernail polish. This will make verification each morning a bit easier and obvious. If you do install new grates, be sure to document what was installed (manufacture & model number), the date the grate was installed, and the expiration date. Most manufacturers will provide you with a General Certificate of Conformity that lists the grates specifications and that will allow you to enter the date of installation. Post that document in the pump room in a waterproof sleeve. Keep a 2<sup>nd</sup> copy in office.



More info here from the Pool and Hot Tub Alliance: <https://www.phta.org/pub/?id=7502B8D1-1866-DAAC-99FB-BB83D1F88365>

Here is the AquaStar web site with more information. We cannot promote this company's products, but they are doing a lot of research in this field, and this is a pretty good site with lots of information.

[https://www.dropbox.com/s/9kv1fxgw8v4mm8i/How%20to%20Size%20and%20Select%20a%20VGBA%20202017%20Compliant%20Drain%20System\\_Final%20Draft\\_110721.2\\_Digital\\_Compressed.pdf?dl=0](https://www.dropbox.com/s/9kv1fxgw8v4mm8i/How%20to%20Size%20and%20Select%20a%20VGBA%20202017%20Compliant%20Drain%20System_Final%20Draft_110721.2_Digital_Compressed.pdf?dl=0)

Thank you for your attention to these important public health and safety matters.

