



Thomas Newton, MPP, REHS
Director

Chester J. Culver
Governor

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Lt. Governor

MEMORANDUM

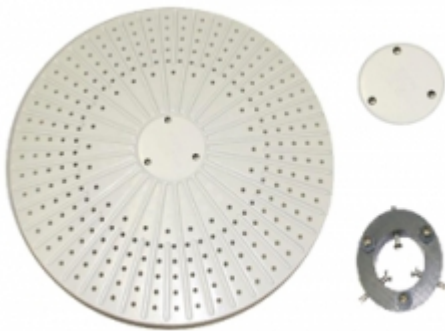
DATE: May 1, 2009

TO: General Interest - Aquatic Facilities

FROM: Michael Magnant

RE: VGB Compliance – Gary Equipment Company Retro 8/24

The Gary Equipment Company of San Antonio, TX, manufactures a drain cover designed to fit in existing 8-inch diameter sumps. The cover is 24 inches in diameter and is stated to be “unblockable” as defined in ASME A112.19.8a-2008. The intent is to bring a single-drain pool into compliance with the federal Virginia Graeme Baker Pool and Spa Safety Act (VGB) without requiring the installation of a safety vacuum release system (SVRS) or another entrapment prevention device or method.



I have reviewed the product, including obtaining the test report for the part from IAPMO R & T. The cover was tested against the requirements of ASME A112.19.8a-2008 for ultraviolet light resistance, structural strength, pullout resistance, unblockability, and prevention of hair and body entrapment. The report from IAPMO R & T attests that the cover met all of the requirements of the ASME standard.

Based on the information I have, I judge that the Gary Equipment Company Retro 8/24 is an acceptable, unblockable drain cover. It may be used for VGB compliance without supplemental entrapment protection such as an SVRS.

The use of the cover is subject to the conditions below:

1. The cover must be installed strictly in accordance with the manufacturer’s instructions.
2. The system flow rate must be less than 117 GPM.
3. The floor must be flat enough so that the edge of the cover is flush with the floor around the full perimeter of the cover.

The Consumer Product Safety Commission (CPSC) has expressed reservations about the stand-alone use of this part, but they have not shared the technical basis for their concern. My understanding is that the cover is still under consideration by CPSC with an uncertain date of resolution.