



Brenda Fitzgerald, MD, Commissioner | Nathan Deal, Governor

2 Peachtree Street NW, 15th Floor
Atlanta, Georgia 30303-3142
www.health.state.ga.us

MEMORANDUM

TO: Sidney Barrett, General Counsel, Department of Public Health

FROM: Maurice Redmond, Program Director, Public Swimming Pools and Tourist Accommodations Program

RE: Variances for Chapter 290-5-57, Rules and Regulation for Swimming Pools, Spas and Recreational Waterparks, .10 (1) (b) Main Drain Spacing, .11 (4) Water Depths, .11 (1) Surface Skimmer Systems, .06 Decks and Deck Equipment (6) Spa Entry/Exit 6. “.10 (2) “Suction outlets, .10 (3) “Net openings in each floor outlet covering, 290-5-57-.11 (1) Surface Skimmer Systems

Attached is a variance request from petitioner, Georgia Southern University Football Operations, 205 Lanier Drive, Statesboro, GA 30458 for your review. If you have any questions please contact me at 404-463-2754 or email mredmond@dhr.state.ga.us.



We Protect Lives.

Rules Variance/Wavier Register

Chapter: 290-5-57

Rule Number: .10 (1) (b) Main Drain Spacing, .11 (4) Water Depths, .11 (1) Surface Skimmer Systems, .06 Decks and Deck Equipment (6) Spa Entry/Exit 6. “.10 (2) “Suction outlets, .10 (3) “Net openings in each floor outlet covering, 290-5-57-.11 (1) Surface Skimmer Systems NSF Approval

Date: January 15, 2014

Action Requested: Variances on Treadmill Pool, Thermal Plunge Spa and Polar Plunge Spa

Name of Petitioner: Georgia Southern University Football Operations
205 Lanier Drive
Statesboro, GA
30458

Contact Person: Bonnie McMakin

Phone number: 912-478-1305

Attorney or representing petitioner: Kayton Smith, Jr. P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

I. General:

The Georgia Southern University Football Operations is installing two prefabricated 750 gallon therapy spas and a 57 square foot prefabricated 3100 gallon treadmill pool. All equipment will be in an indoor controlled access location that will be monitored by the University staff. These therapeutic spas will not be available for use by the general public. These facilities will be used extensively for the purpose of physical therapy. Below are the requirements in which GSU would like to vary from in Chapter 290-5-57, Rules and Regulation for Swimming Pools Spas and Recreational Waterparks. Their are six variances impacting the GSU Football Operations facility.

II. Requests Impacting Treadmill Pool Construction:

1. 290-5-57-.11 (4) Water Depths
“Water depths at the shallow end of the swimming area shall be a maximum of three feet six inches (3’6”) except for racing pools, which must have a minimum depth of three feet six inches (3’6”).”
2. 290-5-57-.10 (1) (b) “All pools shall be provided with at least two main drain suction outlets in the lowest point of the pool floor. The spacing of the main drains shall be at least five feet

(5'), but not greater than twenty feet (20') on centers nor more than fifteen feet (15') from each side wall.”

3. 290-5-57-.11 (1) Surface Skimmer Systems

“Where automatic surface skimmers are used as the sole overflow system in pools, at least two (2) surface skimmers shall be provided for the first five hundred (500) square feet or fraction thereof of the water surface area and one (1) skimmer shall be provided for each additional five hundred (500) square feet of surface area....”

Reason for Request: The Hydro Worx Treadmill Pool is 57 square feet and has a submerged treadmill in a prefabricated shell. With the treadmill submerged in operating position, the apparent usable pool floor will essentially be flat. The operator moves the treadmill to water surface area for entry and then to a deep of approximately 5'-6". The deep of the pool will vary by raising and lowering the treadmill. The professional engineer states all equipment used for this facility is UL listed for electrical safety. The pool has two main drains in the pool floor spaced three feet apart. The treadmill pool has one skimmer that provides a 60 minute turnover rate for the volume of water. The treadmill pool will be used by athletes who generally have injuries. While moving on the submerged treadmill, the buoyancy provided by deeper water will reduce impact and stress on the injured extremity. The user will be continuously monitored by staff while in the pool. The Treadmill Pool will be a controlled access operation for student athletes.

Agency Decision: Section Recommends Approval with Conditions

Rationale: The pool rules provide the minimum design, construction and operation requirements that are intended to protect the health and safety of the public in swimming pools. The Georgia Southern University Football Operation Facility will house this special purpose pool that requires deviations from this regulation to accommodate special use for the university's athletes. The maximum depth requirement for shallow water allows non swimmers a safe depth for maintaining contact and sure footing with pool bottom. This will not be a concern with this adjustable treadmill pool. Our rules also require a 5 foot separation between main drain covers to prevent entrapment. New federal mandates require outlet testing, labeling and separation distance. The separation distance conflicts with our current rule but the outlets selected are VGB complaint and will be installed in accordance with the Act which allows a 3 foot separation distance. Any future revision of the state rules will incorporate the federal standard for suction outlet protection and placement.

Conditions:

1. The designer provides written notice to the local health department that the suction outlets were installed in accordance with the approved plans, manufacturer's specifications and VGB Act.
2. The installer provides the local health department with the suction outlets manufacturer's certificate of compliance that details the covers specifications and the installation date.
3. GSU designated staff monitor treadmill pool during operation.
4. The project's registered engineer shall verify in writing the treadmill pool appurtenances

comply with manufacturer installation requirements and any other national or local codes.

III. Request Impacting Thermal and Polar Plunge Spas Construction:

Chapter 290-5-57-.06 Decks and Deck Equipment (6) Spa Entry/Exit 6. “The outer two-inch (2”) edge of each step shall be painted a contrasting color.”

Reason for Request: The facility will also have polar and thermal plunge spas. These spas are prefabricated acrylic plastic shells. The contrasting marking on the steps are manufacturer embedded 1” square contrasting color tiles. The spas provide 57 square feet of water surface area and have 27.6 linear feet of perimeter. Retooling the manufacturing equipment to provide for 2 inch sized tiles would be very expensive. These therapy spas will be used in a controlled indoor operation under staff supervision and will not be for public use.

Agency Decision: Section recommends approval

Rationale: Marking the ingress/egress with two inch contrasting color provides the bather with a visual cue that a change in elevation is expected. The size allows recognition and contrast. At this facility, the restricted access and size of the spas should mitigate markings size. The spas will have all other required depth markings and warning signs.

IV. Requests Impacting Treadmill Pool, Thermal and Polar Plunge Spas Construction:

1. Chapter 290-5-57-.10 (2) “Suction outlets shall be provided with a cover that has been tested and approved by a nationally recognized testing laboratory and shall comply with ANSI/ASME A112.19.8M-1987, Suction Fitting For Use in Swimming Pools, Wading Pools, Spas, Hot Tubs And Whirlpool bathtub Appliances.”
2. Chapter 290-5-57-.10 (3) “ Net openings in each floor outlet covering or grating shall be at least four times the area of the discharge pipe and provide sufficient area so that the maximum velocity of the water passing the grate will not exceed one and one-half feet per second (1-1/2fps).”
3. 290-5-57-.11 (1) Surface Skimmer Systems
“A surface skimming system shall be provided on all swimming pools and spas and shall be designed and constructed to skim the pool or spa surface when the water level is maintained within the operational parameters of the system’s rim or weir device. Surface skimming devices shall comply with NSF International Standard 50.”

Reason for Request: The Georgia Pool Code was written and adopted prior to enactment of the federally mandated Virginia Graeme Baker Pool and Spa Act (VGB). Every suction outlet in the proposed two spas and treadmill pool will have a VGB-compliant suction outlet cover which may not meet the Georgia rule but meets the federal mandate. Through laboratory testing, VGB compliant covers are evaluated to meet or exceed entrapment standards. One anti-entrapment function in the Georgia rule places limits on the speed water flows across the main drain covers.

Also, this petitioners states an NSF 50 compliant surface skimmer would lower the water level within each spa and reduce the therapeutic/healing actions.

Agency Decision: Section recommends Approval with Conditions

Rationale: The Virginia Grame Baker Act regulates the manufacture, sale and distribution of submerged suction outlet covers and requires third party certification and conformance with the new standard for Suction *Fittings for Use in Swimming Pools, Wading Pools, Spas, and Hot Tubs*. The net opening requirement may at times conflict with the VGB Act. The Act requires resting to insure the cover can protect a user against the five forms of entrapment. In this case, the sizing requirement conflicts with the federal law regulating suction outlet covers. Covers tested to the standard shall have embossed on them, maximum flow rate, installation location, expiration date. Also, other equipment requires third party listing. The petitioner made a request to use a non NSF 50 standard circulation equipment in the pool. The rules require chemical feeders, chlorinators, filters and other items to have the NSF 50 listing. The petition wants to use a non NSF labeled skimmers in all three bodies of water and states these are commonly used in these type of therapy pool installations.

Conditions:

1. The designer provides written notice to the local health department in accordance with the conditions in section II. 1. and 2. above.
2. The project professional engineer provides written verification that the skimmers could meet or exceed NSF 50 or equivalent standards and are installed in accordance with the manufacturer's specifications.

If you have any questions regarding this variance, please contact me at 404-657-6534 or email me at mredmond@dhr.state.ga.us

**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Treadmill Pool Depth Variance

Date: November 22, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

2. Rule from which a variance is requested

290-5-57-.11 (4) Water Depths

“Water depths at the shallow end of the swimming area shall be a maximum of three feet six inches (3’6”) except for racing pools, which must have a minimum depth of three feet six inches(3’6”).”

3. Type of action requested

Variance. Request maximum depth be allowed at five feet two inches (5’2”).

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

Treadmill Pool will be used by athletes who generally have injuries. User buoyancy provided by deeper water level will reduce stress on the body extremities while moving on the submerged treadmill. The user will be continuously monitored by staff while in the pool as observations are made and therapy continues. With the treadmill submerged in operating position the apparent usable pool floor will essentially be flat. Treadmill Pool will be used in a controlled access operation and pool will not be available for public use.

Having a lesser water depth will not afford the user as much body support during his therapy session which may prolong the injury recovery time period.

5. Detail the alternative standards petitioner agrees to meet,

Not applicable

6. List the reasons

Not applicable

7. List the reasons the variance or waiver requested would serve the purpose of the underlying statute upon which the Rule is based.

Treadmill Pool is intended for use by the University's football player athletes whose ages would normally be in the 18-to-22-year-old range. The users will be students with better than average physical abilities and often with injuries that activity within the pool will help to heal. As there is no "shallow end" and the users will all be 18 years of age or older there is very little need for a lesser water depth.

8. Duration of the variance or waiver.

Permanent variance for as long as treadmill pool is in operation.

**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Treadmill Pool Main Drain Variance

Date: November 22, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

2. Rule from which a variance is requested

290-5-57-.10 (1)(b) “All pools shall be provided with at least two main drain suction outlets in the lowest point of the pool floor. The spacing of the main drains shall be at least five feet (5’), but not greater than twenty feet (20’) on centers nor more than fifteen feet (15’) from each side wall.”

3. Type of action requested

Variance. Acceptance of two main drains 3’ apart is requested

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

Treadmill Pool with 57 square feet of water surface and a submerged powered treadmill is part of a prefabricated steel shell pool that has two (2) main drains in pool floor, each with a drain grating that complies with the Virginia Graeme Baker Pool and Spa Act (VGB) and are located three (3) feet on center from each other. These drains and covers

are inaccessible to the pool user during entry, exit and operational use of this pool. The covers are only accessible after the pool is drained, removing drain gratings as a safety issue for the pool user.

Redesigning and manufacturing a one-of-a-kind pool with main drains 5 feet apart would be very expensive for the University and would not alter any safety protection to pool user.

5. Detail the alternative standards petitioner agrees to meet.

The pool manufacturer indicates that a third main drain that is at least 5 feet away from one of the initial two drains could be added but at additional expense to the University.

6. List the reasons

Addition of third main drain with VGB-compliant grating could be done only to meet the letter of the Code. This action does not increase pool use safety which is the intent of this Code rule.

7. List the reasons the variance or waiver requested would serve the purpose of the underlying statute upon which the Rule is based.

The provided two main drains, each with capacity for 100% of recirculation water flow, are not user accessible and thus pose no user safety issue.

8. Duration of the variance or waiver

Permanent variance for as long as the treadmill pool is in operation.

**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Treadmill Pool Skimmer Variance

Date: November 22, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

2. Rule from which a variance is requested

290-5-57-.11 (3)”

“Where automatic surface skimmers are used as the sole overflow system in pools, at least two (2) surface skimmers shall be provided for the first five hundred (500) square feet or fraction thereof of the water surface area and one (1) skimmer shall be provided for each additional five hundred (500) square feet of surface area....”

3. Type of action requested

Variance

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

This Treadmill Pool does not seem to be addressed specifically in chapter 290-5-57 but is being treated as a Special Activity Pool with a 1-hour water recirculation turnover rate.

The pool is manufactured with only one surface skimmer that is capable of handling 100% of recirculating flow rate. Only one user may occupy the pool at any time. This pool is prefabricated steel shell with fittings and mechanisms for operating a treadmill underwater and for raising and lowering the treadmill surface for user entry/exit when up at pool deck level and submerged for monitored activity. Treadmill Pool will used in a controlled operation, monitored by a staff person while the user is in the pool and pool will not be available for public use.

Redesigning and manufacturing a one-of-a kind pool with two skimmers for Georgia Southern University would become a very expensive endeavor with the cost borne by the University.

5. Detail the alternative standards petitioner agrees to meet,

Not applicable

6. List the reasons

Not applicable

7. List the reasons the variance or waiver requested would serve the purpose of the underlying statute upon which the Rule is based.

Treadmill Pool is intended for use by the University's football player athletes whose ages would normally be in the 18-to-22-year-old range. The users will be students with better than average physical abilities, will not be using the spas for simple recreation, will be using the spas for physical therapy, will be monitored by various video cameras during use and will be entering and leaving the spas while being supervised by University physical training staff personnel. This pool's water surface area is 57 square feet which is only 4 feet larger than new proposed spas that have only one skimmer and a 30-minute water recirculation rate. Treadmill pool with one skimmer is a standard design by manufacturer (Hydroworx) and is in use throughout the country with one surface skimmer.

8. Duration of the variance or waiver.

Permanent variance for as long as treadmill pool is in operation.

**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Polar Plunge and Thermal Plunge Spas Steps Variance

Date: November 22, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President

SAV Engineering, Inc.
Savannah, GA 31406

2. Rule(s) from which a variance or waiver is requested.

Chapter 290-5-57-.06 Decks and Deck Equipment (6) Spa Entry/Exit 6. "The outer two-inch (2") edge of each step shall be painted a contrasting color."

3. Type of action requested.

a. variance

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

Proposed Polar Plunge and Thermal Plunge therapy spas are prefabricated acrylic plastic shells that are manufactured using embedded 1” square contrasting color tiles in the spa entry/exit steps. Re-tooling the manufacturing equipment to provide for 2” sized tiles would be very expensive. These therapy spas will be used in a controlled indoor operation under staff supervision and will not be available for public use.

5. Detail the alternative standards petitioner agrees to meet.

No alternatives proposed

6. List the reasons that such alternative standards would afford adequate protection for the public health, safety, and welfare.

Not applicable

7. List the reasons the variance or waiver requested would serve the purpose of the underlying statute upon which the Rule is based.

These therapy spas are intended for use by the University's football player athletes whose ages would normally be in the 18-to-22-year-old range. The users will be students with better than average physical abilities, will not be using the spas for simple recreation, will be using the spas for physical therapy and will be entering and leaving the spas while being supervised by University physical training staff personnel. The user's visual perception should be excellent before, during and after spa use. The contrasting tile reduced size is expected to be easily observable by all users in this application.

8. Duration of the variance or waiver.

Permanent variance for as long as each spa is in operation.

**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Polar and Thermal Plunge Spa Surface Skimmer Type Variance

Date: November 6, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

2. Rule from which a variance is requested

290-5-57-.11 (1) Surface Skimmer Systems

“A surface skimming system shall be provided on all swimming pools and spas and shall be designed and constructed to skim the pool or spa surface when the water level is maintained within the operational parameters of the system’s rim or weir device. Surface skimming devices shall comply with NSF International Standard 50.”

3. Type of action requested

Variance: Request that skimmer not comply with NSF International Standard 50.

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

Installation of a NSF International Standard 50 compliant surface skimmer would lower the water level within each spa and reduce the therapeutical action the spa water would have on the user. Lower water level would reduce the spas effectiveness in promoting healing of the athletes using the spas.

5. Detail the alternative standards petitioner agrees to meet.

Not applicable

6. List the reasons

Not applicable

7. List the reasons the variance or waiver requested would serve the purpose of the underlying statute upon which the Rule is based.

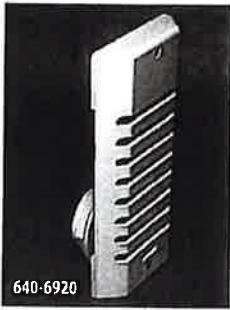
Proposed spa skimmer is sized to carry 100% flow and will allow spa water level to provide maximum user coverage for the height of the spa. Proposed skimmer will be installed with an equalizer line.

The spas will be used in an indoor controlled access location and will be monitored by the University staff. These spas will not be available for use by the public. The non-NSF skimmers are used extensively in spas of this type for the purpose of physical therapy.

8. Duration of the variance or waiver

Permanent variance for as long as the spas are in operation

Spa Skimmers and Filters / Strip Skimmers and Front Access Skim Filters



640-6920



640-6940



640-6961



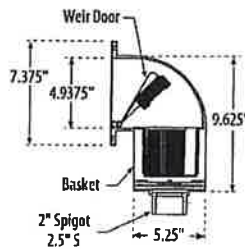
640-6607

Strip Skimmers

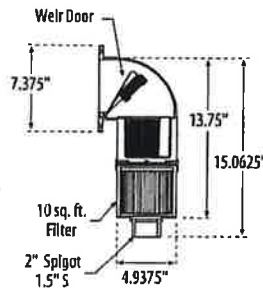
Part No.	Description	Case Quantity	List (US \$)
640-6920	Strip Skimmer - 1 1/2" x Standard Nut	35	24.37
640-6940	Strip Skimmer - 1 1/2" x 90° EI	25	28.25
640-6960	Strip Skimmer - 1 1/2" x Straight Adapter Nut	25	28.24
640-6600	Adjustable Strip Skimmer with Lint Basket - 1/2" S EI	20	43.01



510-1500



510-1600

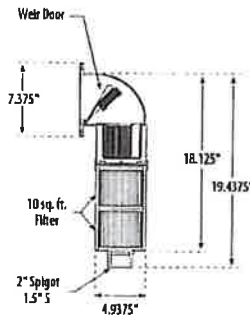


INCLUDES:

- 10 sq. ft. Cartridge
- EZ Flow Basket
- Flow Control Diverter Plate
- Trim Plate - White
- Mounting Gasket



510-1650T



INCLUDES:

- 10 sq. ft. Cartridges (2)
- EZ Flow Basket
- Flow Control Diverter Plate
- Trim Plate - White
- Mounting Gasket

Front Access Skimmers and Skim Filters

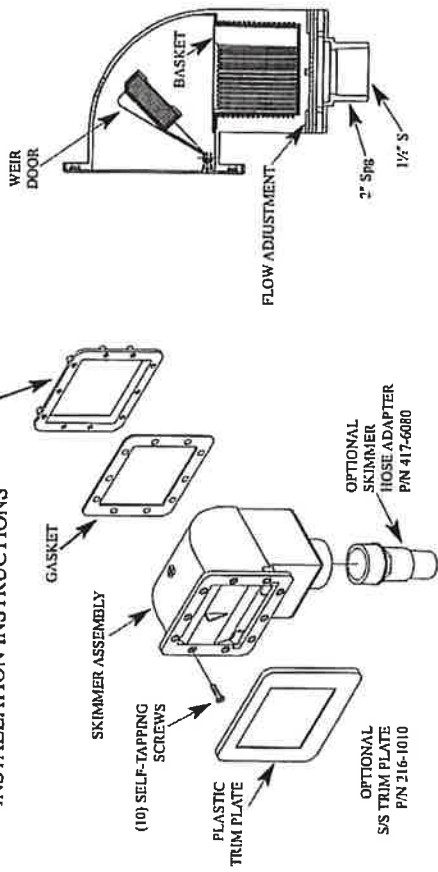
Part No.	Description	Case Quantity	List (US \$)
510-1500	Square Spa Skimmer - 1 1/2" S / 2" Spigot - Flow Control with Trim Plate	4	74.28
510-1600	Square Spa Skim Filter - 1 1/2" / 2" Spigot - 10 sq. ft.	4	114.99
510-1650T	Square Spa Skim Filter - 1 1/2" / 2" Spigot - 20 sq. ft.	2	146.93



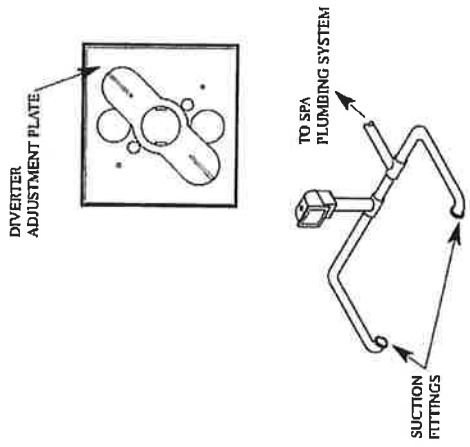
Waterway

SPA SKIMMER INSTALLATION INSTRUCTIONS

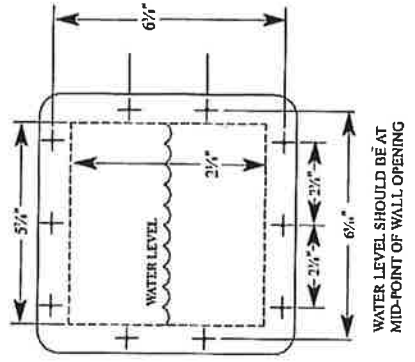
SPA SKIMMER INSTALLATION INSTRUCTIONS



FLOW ADJUSTMENT
REMOVE BASKET TURN DIVERTER
PLATE CLOCKWISE TO INCREASE
FLOW. TURN COUNTER CLOCK-
WISE TO REDUCE FLOW.



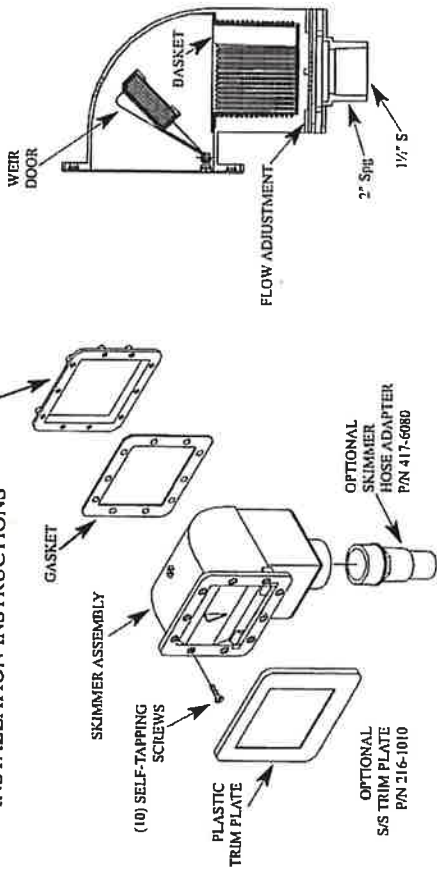
HOLE PATTERN DIMENSIONS HOLE PATTERN FOR MOUNTING SPA SKIMMER



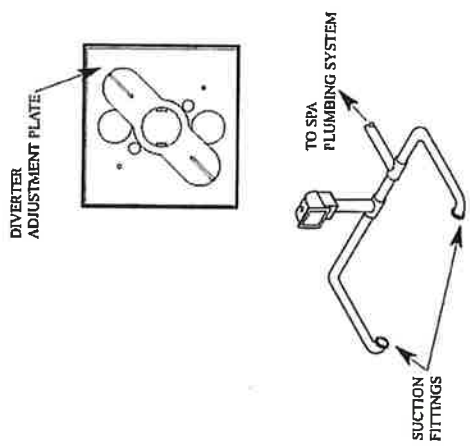
Waterway

SPA SKIMMER INSTALLATION INSTRUCTIONS

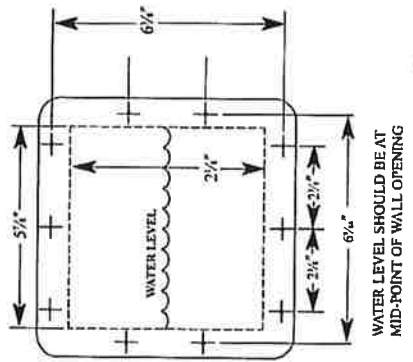
SPA SKIMMER INSTALLATION INSTRUCTIONS



FLOW ADJUSTMENT
REMOVE BASKET TURN DIVERTER
PLATE CLOCKWISE TO INCREASE
FLOW. TURN COUNTER CLOCK-
WISE TO REDUCE FLOW.



HOLE PATTERN DIMENSIONS HOLE PATTERN FOR MOUNTING SPA SKIMMER



**Georgia Department of Public Health
Environmental Health Section, Land Use Unit
2 Peachtree Street, NW. 13th Floor
Atlanta, Georgia 30303-3186
404-657-6534**

Variance for Spas and Treadmill Pool Suction Covers

Date: November 21, 2013

1. Petitioner

Name: Georgia Southern University Football Operations

Address: 205 Lanier Drive

Statesboro, GA 30458

Property location: 205 Lanier Drive

Statesboro, GA 30458

Phone number: 912-478-1305

Contact person: Bonnie McMakin

Person representing petitioner: Kayton Smith, Jr., P.E.
Vice President
SAV Engineering, Inc.
Savannah, GA 31406

2. Rule(s) from which a variance or waiver is requested.

Chapter 290-5-57-.10 (2) “Suction outlets shall be provided with a cover that has been tested and approved by a nationally recognized testing laboratory and shall comply with ANSI/ASME A112.19.8M-1987, Suction Fitting For Use in Swimming Pools, Wading Pools, Spas, Hot Tubs And Whirlpool bathtub Appliances.”

Chapter 290-5-57-.10 (3) “ Net openings in each floor outlet covering or grating shall be at least four times the area of the discharge pipe and provide sufficient area so that the maximum velocity of the water passing the grate will not exceed one and one-half feet per second (1-1/2fps).”

3. Type of Action requested.

a. Variance

4. List the specific facts of substantial hardship, which would justify a variance or waiver for petitioner.

The current Swimming Pool Code for Georgia, chapter 290-5-57 was written and adopted prior to enactment of the federally mandated Virginia Graeme Baker Pool and Spa Act (VGB) which is now in effect. This Act essentially requires that all suction outlets in pools and spas shall be provided with an entrapment preventive covers.

Every suction outlet in the proposed two spas and treadmill pool will have a VGB-compliant suction outlet cover which may not meet the Georgia Chapter 290-5-57 code but must be installed per federal mandate. These VGB-compliant covers meet or exceed the intent of the anti-entrapment function of the Georgia code.

5. Detail the alternative standards petitioner agrees to meet.

No alternatives.

6. List the reasons.

All manufacturers of spas and pools must conform to the federal VGB requirement. No legal alternative seems possible.

7. List the reasons the variance or waiver requested would serve the purpose to the underlying statute upon which the Rule is based.

The VGB-compliant suction covers have been tested to meet federal standards to prevent underwater entrapment by persons including small children. The proposed pools will be used in a controlled environment supervised by University staff and immersion will only be by University athletes. The VGB-compliant suction covers meet or exceed the Georgia code to prevent entrapment by persons at suction outlets.

8. Duration of the variance or waiver.

Permanent variance for as long as the two spas and treadmill pools, individually, are in operation.



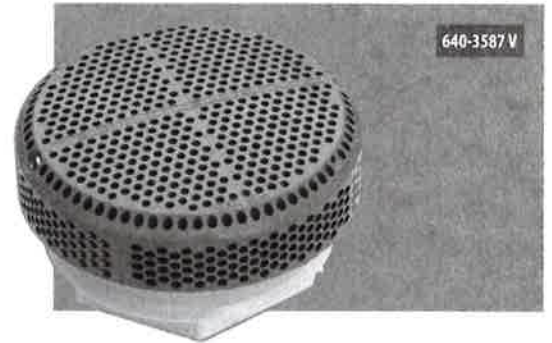
SPC-3 V

5" Suction

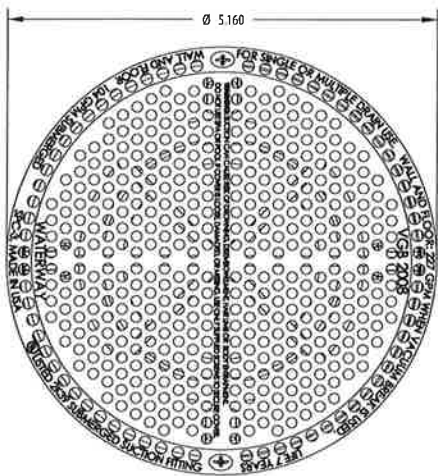
Waterway suction are compliant with the Virginia Graeme-Baker Pool and Spa Safety Act (ASME/ANSI A112.19.8-2007) and are UL Certified. They are designed for single or multiple drain use. This suction assembly includes cover, wall fitting assembly, and stainless steel screws. Packed 40 per case.

The Waterway SPC-3 V series suction are available in:

- White
- Black
- Gray
- Dark Gray
- Beige



Model No.	Description	Size	Total Open Area Square Inches	Floor Flow Rate GPM	Wall Flow Rate GPM	Flow Rate GPM @ 1.5 ft/sec
640-357x V	SPC-3 V - 2"	5"	9.02	N/A	180 @ 6.42 ft/sec	42
640-358x V	SPC-3 V - 2 1/2"	5"	9.02	N/A	180 @ 6.42 ft/sec	42



Part No.	Description
642-363x V	Suction Cover
819-1250	#6 Stainless Steel Screw - 20 x 1/4"
711-3260	Gasket
215-3620	2" Wall Fitting (for 640-357x V)
215-3610	2 1/2" Wall Fitting (for 640-358x V)
642-3620	Wall Fitting Nut

