

From: Jennifer Hatfield <jen@jhatfieldandassociates.com>
Sent: Friday, January 30, 2026 5:24 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: comment submittal related to SW12309

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Mo - while reviewing the referenced standards chapter of the FBC, Building, I found under the list of ASME standards a relic. Specifically, ASME A112.19.8 is still listed, which was the old drain covers standard for pools and spas (suction outlets).

The ASME standard was cited in the federal Virginia Graeme Baker Pool & Spa Safety Act (VGBA). However, the Consumer Product Safety Commission (CPSC), issued direct final rule 84 Fed. Reg 24021 (May 24, 2019) establishing the ANSI/APSP/ICC-16 Standard for Suction Outlet Fitting Assemblies (SOFA) for Use in Pools, Spas, and Hot Tubs as the successor-standard to the ASME A112.19.8.

For additional background: <https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/Pool-and-Spa-Drain-Covers>

Accordingly, in Chapter 35 (Referenced Standards), I would suggest the removal of the legacy ASME A112.19.8 standard. In addition, where the ASME standard is still cited in the Chapter 4, it should be replaced with the ANSI/APSP/ICC-16 2017 edition, which is already provided for in other sections of the code and cited within Chapter 35.

My thought is this comment can be related to proposal SW12309 that I submitted on behalf of the Pool & Hot Tub Alliance. That proposal updated the PHTA standards (formerly APSP). Suggested changes to align with federal law and be consistent with other sections where we cite ANSI/APSP/ICC-16 are as follows:

454.1.6.5.3.2.3 Equalizers.

If installed, an equalizer valve shall be a spring-loaded vertical check valve that will not allow direct suction on the equalizer line. Float valves are prohibited. If installed, the equalizer line outlet shall be installed at least 1 foot (305 mm) below the normal pool water level and the equalizer line outlet shall be protected by an **ANSI/APSP/ICC 16 ASME/ANSI A112.19.8** compliant cover/grate. Any equalizer line shall be 2 inches (51 mm) or larger.

Chapter 35, Referenced Standards:

APSP (PHTA Standards)

ANSI/APSP/ICC 16—

2017 American National Standard for Suction Outlet Fittings Assemblies (SOFA)

for Use in Pools, Spas, and Hot Tubs.
..... 454.1.6.5.3.2.3, 454.1.6.5.10, 454.1.6.5.12

ASME

~~A112.19.8 Suction Fittings for Use in Swimming Pools, Wading Pools, Spas, Hot Tubs,
and Whirlpool Bathtub Appliances~~

~~454.1.6.5.3.2.3~~

Best,

Jen

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