

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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