



June 9, 2009

**REVISED**

DEPARTMENT OF COMMERCE  
SAFETY AND BUILDINGS  
201 W. WASHINGTON AVE  
PO BOX 7162  
MADISON WI 53707-7162

Re: Description: POOL, ALTERNATE SYSTEMS  
Manufacturer: DEPARTMENT OF COMMERCE  
Product Name: VIRGINIA GRAEME BAKER POOL  
Model Number(s): NONE  
Product File No: 20080553

The specifications and/or plans for this alternate pool have been reviewed and determined to be in compliance with chapters Comm 82 through 84, Wisconsin Administrative Code, and Chapters 145 and 160, Wisconsin Statutes.

The Department hereby issues an alternate approval to s. Comm 90 based on the Wisconsin Statutes and the Wisconsin Administrative Code. This approval is valid until the end of June 2014.

This alternate is based on the department's determination that the federal entrapment standards meet the intent of Comm 90 requirements. This alternate may only be utilized on alterations/modifications to existing pools where the basin shell is not disturbed. Existing means pools licensed by the Department of Health Services prior to January 1, 2009.

The approval is contingent upon compliance with the following stipulations:

- Regardless of pool water depth, the horizontal distance between the center lines of the most distant hydraulically connected grates shall be at least 36".
- Where the suction main drain is located in at least a 32-inch water depth, an existing single main drain or set of drains and the installation of the drains does not comply with s. Comm 90.20 (8) (effective until December 31, 2008), or s. Comm 90.14 (13) (c) 2. b. (effective March 1, 2009), Wis. Adm. Code, may remain if one of the following is installed:
  - a. Suction-limiting vent system
  - b. Safety Vacuum Release System tested to comply with ASTM F2387 (May be used in conjunction with hydrostatic relief valves, but may not be used in conjunction with check valves)  
Safety Vacuum Release System tested to comply with ASME A112.19.17 (May not be used in conjunction with hydrostatic relief valves or check valves)
  - c. Gravity drainage system
  - d. Automatic pump shut-off system
  - c. Any other system approved by the department
- Single unblockable drain covers must be designed with holes located in a pattern so that a body blocking element of 18" X 23" will not block the drain.

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- All systems shall be installed in accordance with the manufacturer's recommendations. Grates serving gravity drain systems may be installed less than 1.5 pipe diameters from the suction outlet opening if the velocity is limited to 1.5 feet per second or less.
- Safety vacuum release systems shall only be installed in conjunction with an ASME/ANSI A112.19.8 suction fitting (grate).
- A cover or grate that is listed for compliance with ASME/ANSI A112.19.8-2007 having a rated velocity that exceeds 1.5 feet per second is permitted to be installed. The installation shall comply with the separation distance recommended by the manufacturer between the suction outlet opening and the bottom of the grate.
- Existing equalizer pipe suction outlets may be eliminated when the department is provided with a letter from the owner stating that the owner understands the risk of pump failure due to air-lock.
- Prior to installation of the modification, plans must be submitted and approved for each public swimming pool or water attraction modification.
- Inspection of the modification construction is required.
- Any and all additional modifications or alterations to the public swimming pool or water attraction must be made in compliance with chapter Comm 90, Wis. Adm. Code.

The department is in no way endorsing this product or any advertising, and is not responsible for any situation which may result from its use.

Sincerely,

James H. Miller  
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