

**Glatz, Linda**

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**From:** Trish Watson [twatson@nrhtx.com]  
**Sent:** Thursday, November 12, 2009 10:50 AM  
**To:** tsteven@cpsc.gov  
**Cc:** Glatz, Linda  
**Subject:** FW: Comments for VGB compliance form

Resent email

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**From:** Trish Watson  
**Sent:** Thursday, November 12, 2009 9:41 AM  
**To:** 'tsteven@cpsc.govt'  
**Cc:** Stephanie East; Joann Stout  
**Subject:** Comments for VGB compliance form

Tom,

My name is Trish Watson and I work for the City of North Richland Hills Consumer Health Division. We regulate/ inspect public swimming pools within North Richland Hills and wanted to submit comments relating to VGB drain covers.

Attached are some comments regarding the compliance form for Virginia Graeme Baker Act.

- Operators must provide documentation from a pool company stating the drain covers and/or SVRS were installed correctly. This documentation must be available for inspection
- **Engineer's letter stating compliance with VGB**
- Operators must be able to test drain covers to ensure they are intact
- Operators must be required to change covers according to manufacturer instructions ( every 3 or 5 years) and maintain records as needed
- Specific instructions to assist in determining compliance: i.e. drain pool; measure distances between drains, measure pipe diameter, and measure sump size (must be 1.5x pipe diameter, etc.)
- Required notarized statement of compliance from operator assuming liability

Thank you,

Trish Watson, R.S.  
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