APPENDIX C
CODE CHANGE PROPOSAL
NORTH CAROLINA
BUILDING CODE COUNCIL

1429 Rock Quarry Road, Suite 105
Raleigh, North Carolina 27610
(919) 647-0008
david.rittlinger@ncdoi.gov

Petition for Rule Making Item Number B-8

Granted by BCC		**Adopted by BCC**		**Approved by RRC**	
Denied by BCC		**Disapproved by BCC**		**Objection by RRC**	

PROPONENT: Wendy Purser PHONE: (910) 279 - 1540
REPRESENTING: PHTA NC Chapter
ADDRESS: 32 Bear Mtn Rdg
CITY: Green Mountain STATE: NC ZIP: 28740
E-MAIL: purserwendy@gmail.com FAX: ( ) -

North Carolina State Building Code, Volume 2024 NC Residential Code - Section R327.1 & Appendix NC A

CHECK ONE: [ ] Revise section to read as follows: [ ] Delete section and substitute the following:
[ ] Add new section to read as follows: [x] Delete section without substitution:

~~LINE THROUGH MATERIAL TO BE DELETED~~ UNDERLINE MATERIAL TO BE ADDED

Please type. Continue proposal or reason on plain paper attached to this form. See reverse side for instructions.

SEE ATTACHED

Will this proposal change the cost of construction?	Decrease [ ]	Increase [ ]	No	[x]
Will this proposal increase to the cost of a dwelling by $80 or more?		Yes [ ]	No	[x]
Will this proposal affect the Local or State funds?	Local [ ]	State [ ]	No	[x]
Will this proposal cause a substantial economic impact (≥$1,000,000)?		Yes [ ]	No	[x]

- Non-Substantial – Provide an economic analysis including benefit/cost estimates.
- Substantial – The economic analysis must also include 2-alternatives, time value of money and risk analysis.
- Pursuant to §143-138(a1)(2) a cost-benefit analysis is required for all proposed amendments to the NC Energy Conservation Code. The Building Code Council shall also require same for the NC Residential Code, Chapter 11.

REASON: Please see attached

Signature: Date: 04/29/2024

INSTRUCTIONS

Each proposed Code change request shall comply with the following policies:

Rule 1: The Original and twenty-two (22) copies of the proposed Petition for Rule-Making along with supporting documentation shall be filed with the Building Code Council Secretary. Submit one (1) electronic copy via email.

Rule 2: The filing shall be received by the first day of the month prior to the quarterly scheduled meeting date. Example: A December meeting date will require filing by November 1 prior to the meeting.

Rule 3: Each request shall be typewritten on this form and shall contain the following:

(1) The proposed rule change must be set forth in full and contain explicit reference to the affected section or sections of the Code.
(2) The request shall state the reasons for the proposed rule change with supporting documentation.
(3) The proposed rule change shall comply with the standards set forth in GS 143-138(c) and reference to the particular standards shall be set forth in the request for the amendment.
(4) The proposed rule change shall contain an economic impact analysis as required by GS 143-138(a).
(5) A proposed rule change to the NC Energy Conservation Code shall have an accompanying cost-benefit analysis as required by GS 143-138(a1)(2).

Rule 4: When a request is improperly filed or not in accordance with all the rules listed above, the BCC Secretary shall reject the submittal and notify the applicant of the proper procedure to follow.

Rule 5: Upon the proper filing of a request, the BCC Secretary shall forward one copy of said request to each council member prior to the scheduled meeting date. Persons filing proposed petitions are hereby notified of the place and time of the scheduled hearings. The BCC Secretary shall cause to be published the notice of public hearing as specified in GS 143-138(a).

Rule 6: The Council shall either Grant or Deny the proposed Petition for Rulemaking at the meeting following receipt of the proposed rule change. The Council will take no further action on items that are Denied. Granted items may be referred to Committee for review.

Rule 7: The Council will hold a public hearing on Granted items at the next quarterly scheduled meeting. The Council will take final action on Granted items at the next quarterly scheduled meeting after the public hearing.

Timeline Example

Petition received:	**February 1**
Petition Granted:	**March BCC meeting**
Notice of Hearing published:	**April NC Register**
Committee review:	**May - June**
Hearing held:	**June BCC meeting**
Final Adoption:	**September BCC meeting**
Rules Review Meeting:	**November RRC meeting**
Approved:	**December 1**

SECTION R327

SWIMMING POOLS, SPAS AND HOT TUBS

R327.1 General. The design and construction of pools and spas shall comply with the 2021 International Swimming Pool and Spa Code. ~~Appendix NC-A.~~

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~~APPENDIX NC-A~~

~~SWIMMING POOLS, SPAS AND HOT TUBS~~

~~This appendix is a North Carolina addition and not part of the 2024 *International Residential Code*. There will be no underlined text.~~

~~*The provisions contained in this appendix are adopted as part of this code.*~~

~~SECTION NCA101~~

~~GENERAL~~

~~**NCA101.1 General.** The provisions of this appendix shall control the design and construction of swimming pools, spas and hot tubs installed in or on the *lot* of a one- or two-family dwelling.~~

~~**NCA101.2 Pools in flood hazard areas.** Pools that are located in flood hazard areas established by Table R301.2(1), including above-ground pools, on-ground pools and in-ground pools that involve placement of fill, shall comply with Section NCA101.2.1 or NCA101.2.2.~~

> ~~**Exception:** Pools located in riverine flood hazard areas that are outside of designated floodways.~~

~~**NCA101.2.1 Pools located in designated floodways.** Where pools are located in designated floodways, documentation shall be submitted to the *building official*, which demonstrates that the construction of the pool will not increase the design flood elevation at any point within the *jurisdiction*.~~

~~**NCA101.2.2 Pools located where floodways have not been designated.** Where pools are located where design flood elevations are specified but floodways have not been designated, the applicant shall provide a floodway analysis that demonstrates that the proposed pool will not increase the design flood elevation more than 1 foot (305 mm) at any point within the *jurisdiction*.~~

~~SECTION NCA102~~

~~DEFINITIONS~~

~~**NCA102.1 General.** For the purposes of these requirements, the terms used shall be defined as follows and as set forth in Chapter 2.~~

~~**ABOVE-GROUND/ON-GROUND POOL.** See "Swimming pool."~~

BARRIER. A permanent fence, wall, building wall or combination thereof that completely surrounds the swimming pool and obstructs access to the swimming pool.

HOT TUB. See "Swimming pool."

IN-GROUND POOL. See "Swimming pool."

RESIDENTIAL. That which is situated on the premises of a detached one- or two-family dwelling or a one-family *townhouse* not more than three stories in height.

SPA, NONPORTABLE. See "Swimming pool."

SPA, PORTABLE. A nonpermanent structure intended for recreational bathing, in which all controls, waterheating and water-circulating *equipment* are an integral part of the product.

SWIMMING POOL. Any structure intended for swimming or recreational bathing that contains water over 24 inches (610 mm) deep. This includes in-ground, above-ground and on-ground swimming pools, hot tubs and spas.

SWIMMING POOL, INDOOR. A swimming pool which is totally contained within a structure and surrounded on all four sides by the walls of the enclosing structure.

SWIMMING POOL, OUTDOOR. Any swimming pool which is not an indoor pool.

SECTION NCA103

SWIMMING POOLS

NCA103.1 In-ground pools. In-ground pools shall be designed and constructed in conformance with ANSI/APSP/ICC 5 as listed in Section NCA107.

NCA103.2 Above-ground and on-ground pools. Aboveground and on-ground pools shall be designed and constructed in conformance with ANSI/APSP/ICC 4 as listed in Section NCA107.

NCA103.3 Pools in flood hazard areas. In flood hazard areas established by Table R301.2(1), pools in coastal high hazard areas shall be designed and constructed in conformance with ASCE 24.

SECTION NCA104

SPAS AND HOT TUBS

NCA104.1 Permanently installed spas and hot tubs. Permanently installed spas and hot tubs shall be designed and constructed in conformance with ANSI/APSP/ICC 3 as listed in Section NCA107.

NCA104.2 Portable spas and hot tubs. Portable spas and hot tubs shall be designed and constructed in conformance with ANSI/APSP/ICC 6 as listed in Section NCA107.

SECTION NCA105

BARRIER REQUIREMENTS

NCA105.1 Application. The provisions of this chapter shall control the design of barriers for residential swimming pools, spas and hot tubs. These design controls are intended to provide protection against potential drownings and near drownings by restricting access to swimming pools, spas and hot tubs.

NCA105.2 Outdoor swimming pools and spas. An outdoor swimming pool, including an in-ground, above-ground or on-ground pool, hot tub or spa shall be surrounded by a barrier that complies with Sections NCA105.2.1 through NCA105.7.

NCA105.2.1 Barrier height and clearances. Barrier heights and clearances shall be in accordance with all of the following:

1. The top of the barrier shall be not less than 48 inches (1219 mm) above grade where measured on the side of the barrier that faces away from the pool or spa. Such height shall exist around the entire perimeter of the barrier and for a distance of 3 feet (914 mm) measured horizontally from the outside of the required barrier.

2. The vertical clearance between grade and the bottom of the barrier shall not exceed 2 inches (51 mm) for grade surfaces that are not solid, such as grass or gravel, where measured on the side of the barrier that faces away from the pool or spa.

3. The vertical clearance between a surface below the barrier to a solid surface, such as concrete, and the bottom of the required barrier shall not exceed 4 inches (102 mm) where measured on the side of the required barrier that faces away from the pool or spa.

4. Where the top of the pool or spa structure is above grade, the barrier shall be installed on grade or shall be mounted on top of the pool or spa structure. Where the barrier is mounted on the top of the pool or spa, the vertical clearance between the top of the pool or spa and the bottom of the barrier shall not exceed 4 inches (102 mm).

NCA105.2.2 Openings. Openings in the barrier shall not allow passage of a 4-inch-diameter (102 mm) sphere.

NCA105.2.3 Solid barrier surfaces. Solid barriers that do not have openings shall not contain indentations or protrusions that form handholds and footholds, except for normal construction tolerances and tooled masonry joints.

NCA105.2.4 Mesh fence as a barrier. Deleted. Mesh fences, other than chain link fences in accordance with Section NCA105.2.7, shall be installed in accordance with the manufacturer's instructions and shall comply with the following:

1. The bottom of the mesh fence shall be not more than 1 inch (25 mm) above the deck or installed surface or grade.

2. The maximum vertical clearance from the bottom of the mesh fence and the solid surface shall not permit the fence to be lifted more than 4 inches (102 mm) from grade or decking.

3. The fence shall be designed and constructed so that it does not allow passage of a 4-inch (102 mm) sphere under any mesh panel. The maximum vertical clearance from the bottom of the mesh

fence and the solid surface shall be not greater than 4 inches (102 mm) from grade or decking.

4. An attachment device shall attach each barrier section at a height not lower than 45 inches (1143 mm) above grade. Common attachment devices include, but are not limited to, devices that providethe security equal to or greater than that of a hook-and-eye-type latch incorporating a spring-actuated retaining lever such as a safety gate hook.

5. Where a hinged gate is used with a mesh fence, the gate shall comply with Section NCA105.3.

6. Patio deck sleeves such as vertical post receptacles that are placed inside the patio surface shall be of a nonconductive material.

7. Mesh fences shall not be installed on top of onground residential pools.

NCA105.2.4.1 Setback for mesh fences. The inside of a mesh fence shall be not closer than 20 inches (508 mm) to the nearest edge of the water of a pool or spa.

NCA105.2.5 Closely spaced horizontal members. Where the barrier is composed of horizontal and vertical members and the distance between the tops of the horizontal members is less than 45 inches (1143 mm), the horizontal members shall be located on the pool or spa side of the fence. Spacing between vertical members shall not exceed 13/4 inches (44 mm) in width. Where there are decorative cutouts within vertical members, spacing within the cutouts shall not exceed 13/4 inches (44 mm) in width.

NCA105.2.6 Widely spaced horizontal members. Where the barrier is composed of horizontal and vertical members and the distance between the tops of the horizontal members is 45 inches (1143 mm) or more, spacing between vertical members shall not exceed 4 inches (102 mm). Where there are decorative cutouts within vertical members, the interior width of the cutouts shall not exceed 1 3/4 inches (44 mm).

NCA105.2.7 Chain link dimensions. The maximum opening formed by a chain link fence shall be not more than 1 3/4 inches (44 mm). Where the fence is provided with slats fastened at the top and bottomthat reduce the openings, such openings shall be not greater than 1 3/4 inches (44 mm).

NCA105.2.8 Diagonal members. Where the barrier is composed of diagonal members, the maximum opening formed by the diagonal members shall be not greater than 1 3/4 inches (44 mm). The angle of diagonal members shall be not greater than 45 degrees (0.79 rad) from vertical.

NCA105.2.9 Clear zone. Where equipment, including pool equipment such as pumps, filters and heaters, is on the same lot as a pool or spa and such equipment is located outside of the barrier protecting the pool or spa, such equipment shall be located not less than 36 inches (914 mm) from the outside of the barrier.

NCA105.3 Doors and gates. Doors and gates in barriers shall comply with the requirements of Sections NCA105.3.1 through NCA 105.3.3 and shall be equipped to accommodate a locking device. Pedestrian access doors and gates shall open outward away from the pool or spa, shall be self-closing and shall have a self-latching device.

NCA105.3.1 Utility or service doors and gates. Gates Doors and gates not intended for pedestrian use, such as utility or service doors and gates, shall remain locked when not in use.

NCA105.3.2 Double or multiple doors and gates. Double doors and gates or multiple doors and gates shall have not fewer than one leaf secured in place and the adjacent leaf shall be secured with a selflatching device.

NCA105.3.3 Latches release. For doors and gates in barrier, the door and gate latch release mechanisms shall be in accordance with the following:

1. Where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such mechanism shall be located above the finishedfloor or ground surface not less 54 inches (1372 mm).

2. Where door and gate latch release mechanisms are of the self-locking type such as where the lock is operated by means of a key, an electronic opener or the entry of a combinationinto an integral combination lock, the lock operation control and the latch release mechanism shall be located above the finished floor or ground surface not greater than 54 inches (1372 mm).

3. Where the only latch release mechanism of a self-latching device for a gate is located on the pool and spa side of the barrier, the release mechanism shall be located at a point that is at least 3 inches (76 mm) below the top of the gate.

NCA105.3.4 Barriers adjacent to latch release mechanisms. Where a latch release mechanism is located on the inside of a barrier, openings in the door, gate and barrier within 18 inches (457 mm) of the latch shall not be greater than 1/2 inch (12.7 mm) in any dimension.

NCA105.4 Structure wall as a barrier. Where a wall of a dwelling or structure serves as part of the barrier and where doors, gates or windows provide direct access to the pool or spa through that wall, one of the following shall be required:

1. Operable windows having a sill height of less than 48 inches (1219 mm) above the indoor finished floor , doors and doors gates shall have an alarm that produces an audible warning when the window, door or their screens are opened. The alarm shall be listed and labeled as a water hazard entrance alarm in accordance with UL 2017.

2. The operable parts of the alarm deactivation switches shall be located at not less than 54 inches (1372 mm) above the finished floor.

3. A safety cover that is listed and labeled in accordance with ASTM F1346 is installed for the pools and spas.

4. An approved means of protection, such as self-closing doors with self-latching devices, is provided. Such means of protection shall provide a degree of protection that is not less than the protectionafforded by Item 1 or 2.

NCA105.5 Onground residential pool structure as a barrier. An onground residential pool wall structure or a barrier mounted on top of an onground residential pool wall structure shall serve as a barrier where all of the following conditions are present:

1. Where only the pool wall serves as the barrier, the bottom of the wall is on grade, the top of the wall is not less than 48 inches (1219 mm) above grade for the entire perimeter of the pool, the

wall complies with the requirements of Section NCA105.2 and the pool manufacturer allows the wall to serve as a barrier.

2. Where a barrier is mounted on top of the pool wall, the top of the barrier is not less than 48 inches (1219 mm) above grade for the entire perimeter of the pool, and the wall and the barrier on top of the wall comply with the requirements of Section NCA105.2.

3. Ladders or steps used as means of access to the pool are capable of being secured, locked or removed to prevent access except where the ladder or steps are surrounded by a barrier that meets the requirements of Section NCA 105.

4. Openings created by the securing, locking or removal of ladders and steps do not allow the passage of a 4-inch (102 mm) diameter sphere.

5. Barriers that are mounted on top of onground residential pool walls are installed in accordance with the pool manufacturer's instructions.

NA105.6 Natural barriers. In the case where the pool or spa area abuts the edge of a lake or other natural body of water, public access is not permitted or allowed along the shoreline, and required barriers extend to and beyond the water's edge not less than 18 inches (457 mm), a barrier is not required between the natural body of water shoreline and the pool or spa.

NCA105.7 Natural topography. Natural topography that prevents direct access to the pool or spa area shall include but not be limited to mountains and natural rock formations. A natural barrier approved by the governing body shall be acceptable provided that the degree of protection is not less than the protection afforded by the requirements of Sections NCA105.2 through NCA105.5.

NCA105.8 Indoor swimming pool. Walls surrounding an indoor swimming pool shall comply with Section NCA105.2, Item 9.

NCA105.9 Prohibited locations. Barriers shall be located to prohibit permanent structures, equipment or similar objects from being used to climb them.

NCA105.10 Barrier exceptions. Spas or hot tubs with a safety cover that complies with ASTM F1346, as listed in Section NCA107, shall be exempt from the provisions of this appendix.

SECTION NCA106

ENTRAPMENT PROTECTION FOR SWIMMINGPOOL AND SPA SUCTION OUTLETS

NCA106.1 General. Suction outlets shall be designed and installed in accordance with APSP 7(ANSI/PHTA/ICC 7).

SECTION NCA107

REFERENCE STANDARDS

APSP

Pool & Hot Tub Alliance (formerly The Association of Pool &

Spa Professionals)

2111 Eisenhower Avenue, Suite 500

Alexandria, VA 22314

ANSI/APSP/ICC 3—2014 American National Standard for Permanently Installed Residential Spas and Swim Spas

NCA104.1

ANSI/APSP/ICC 4—2012 American National Standard for Aboveground/Onground Residential Swimming Pools—Includes Addenda A Approved April 4, 2013

NCA103.2

ANSI/APSP/ICC 5—2011 American National Standard for Residential Inground Swimming Pools

NCA103.1

ANSI/APSP/ICC 6—2013 American National Standard for Residential Swimming Pool and SpaNCA104.2

ANSI/PHTA/ICC 7—2020 American National Standard for Suction Entrapment Avoidance in Swimming Pools, Wading Pools, Spas, Hot Tubs, and Catch Basins

NCA106.1

ASCE/SEI

American Society of Civil Engineers Structural Engineering Institute

1801 Alexander Bell Drive

Reston, VA 20191-4400

ASCE 24—14 Flood Resistant Design & Construction

NCA103.3

ASTM

ASTM International

100 Barr Harbor, P.O. Box C700

West Conshohocken, PA 19428-2959

F1346—1991(2018) Standard Performance Specification for Safety Covers and Labeling Requirements for All Covers for Swimming Pools, Spas and Hot Tubs

NCA105.1, NCA105.4

ICC

~~International Code Council, Inc.~~

~~500 New Jersey Avenue, NW~~

~~6th Floor~~

~~Washington, DC 20001~~

~~ISPSC—21 International Swimming Pool and Spa Code ----------~~

~~UL~~

~~UL LLC~~

~~333 Pfingsten Road~~

~~Northbrook, IL 60062~~

~~2017—2008 General-purpose Signaling Devices and Systems—with revisions through January 2018 NCA105.4~~

Rationale for ISPSC adoption in North Carolina

The International Swimming Pool and Spa Code (ISPSC) is adopted by 37 states and over 550 localities throughout the United States. It is published jointly by the International Code Council (ICC) and the Pool and Hot Tub Alliance (PHTA), which serves as its secretariat.

The ISPSC is a consensus code created with the input of affected stakeholders from the commercial and residential sectors as well as interested individuals and aquatics professionals throughout the country. It is revised every three years to ensure that the code keeps pace with the many changes in technology and practices that occur in the swimming pool and spa industry. The ISPSC has successfully promoted safe design and construction of residential, public, and semi-public swimming pools, spas, and aquatic recreation facilities since its inception in 2012.

PHTA has performed an analysis of the contents of North Carolina's current swimming pool construction code contained in the North Carolina State Building Code: Residential Code Appendix V "Swimming Pools, Spas and Hot Tubs," (Appendix NC-A) which has been in place since 2015. Our analysis showed that there are many parallels and even some identical language in the two codes. There are also significant differences between the two codes that argue for adoption of the ISPSC.

The reference standards cited in Appendix NC-A in its current edition are not current. Standards that are not current often contain omissions important for the safety of the state's citizens. All reference standards in the ISPSC are kept up to date at the time of each edition's publication.

Trade contractors, not limited to pool builders, desire an easy reference that includes the NEC requirements and other trade standards for builders and officials. The ISPSC, as part of the ICC family of I-Codes, works seamlessly with other I-Codes already in use in North Carolina such as the International Building Code, as well as other national codes such as the National Electrical Code (NEC).

The ISPSC also references and follows the International Energy Conservation Code (IECC) without conflict, ensuring that the energy conservation requirements for pools that are law in North Carolina and of which many pool builders are unaware will be apparent for those who use the pool code. The ISPSC will provide a single reference for safe pool design and construction that includes the federal mandates and all pool related standards applying to the different trades involved in the residential pool and spa industry.

With adoption of the ISPSC, North Carolina will gain a code created with the expertise of the entire nation's aquatics industry and associations that will help ensure the safety of its citizens. North Carolina will also benefit from the ISPSC's constant iteration and improvement created by its and ICC's vital commentary process. This change is important to the functionality and use of this code for the public.

PHTA North Carolina Chapter petitions the North Carolina Building Code Commission (NCBCC) to delete Appendix NC-A and replace it with references to residential swimming pool and spa requirements contained in ISPSC 2024 edition, chapters 1, 2, 3, 7, 8, 9, 10, and the standards referenced in ISPSC Chapter 11.

Wendy Purser Pool Consulting LLC NC License#83236

"A Family Tradition Since 1969" *NC Swimming Pool Specialty license*

Phone: 910-279-1540
E-mail: purserwendy@gmail.com

May 14, 2024

David Rittlinger
Division Chief – Codes and Interpretations

Dear Mr. Rittlinger,

In response to the questions to accompany the NC PHTA Proposal,

The proposal would not impact state or local funds as the ISPSC is available to read at no charge on the ICC site. If any jurisdiction would like to purchase a digital copy or a copy that is in book published format the cost could easily be offset through fees charged for permits and inspections. A single purchase cost is approximately $60. If the jurisdiction has a premium subscription already I believe it is included in that or a nominal fee.

Due to the nature of the proposal, there is no documentation available. The cost of construction would not change as there are no unnecessary demands included that are not already in the existing NC Building codes. I

Adopting the code would not increase the cost of a dwelling as the addition of a pool or spa would not effect the dwelling new or existing other than the costs inherent to pool or spa construction.

Again, due the nature of the proposal there is no documentation that would justify any economic impact that would not occur or occur as there is none.

I have sent in a previous email a PDF version of the 2021 ISPSC and the 2024 ISPSC for the councils use.

Sincerely,

Wendy L. Purser

Ken Gregory
Compliance and Safety

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Mr. David Rittlinger
NORTH CAROLINA BUILDING CODE COUNCIL
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Raleigh, North Carolina 27610
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Mr. Rittlinger

Pentair Water is one of the largest manufacturers of swimming pool equipment in the world. One of our manufacturing plants is in Sanford North Carolina. Swimming Pool safety has the highest priority in our company. We take safety seriously. Having a comprehensive swimming pool and spa code, is essential in producing swimming pool and spa equipment. Having multiple codes in many States causes confusion and leads to safety issues. Most States have recognized this fact by adopting the family of International Code Council's "I" Codes. They include but not limited to the Residential (IRC), Commercial (IBC), Fuel Gas, Mechanical, and Plumbing Codes. These codes are used by builders and manufactures nationwide, that provide a consistent standard of codes to be able to build homes, businesses and manufacture compliant products.

For some reason, swimming pools have not been included in the past. In 2012 the ICC produced the very first comprehensive swimming pool code, the International Swimming Pool, and Spa Code (ISPSC). Every three years this code is revised and updated by the very same process in all the other "I Codes". We just finished this continuing process for the 2027 ISPSC.

The ISPSC is the most comprehensive swimming pool code available. It references most if not all the ANSI/ICC/PHTA Swimming Pool Standards. These Standards includes both the ANSI/ICC/PHTA 7 Entrapment and 16 Fittings and Covers Standards. Both Standards are called out in the Virginia Graham Baker Act, by the Consumer Product Safety Commission. Compliance to these Standards is implied by Federal Law. Pentair would like to highly recommend that North Carolina seriously consider adopting this swimming pool code. By doing so will ensure the building, renovating, and repairing of swimming pools and spas to be safe. If you have any questions or would require more information, I will be happy to supply it to you upon request.

Ken Gregory
Compliance and Safety

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Sincerely,

Ken Gregory
Pentair Safety and Compliance

NORTH CAROLINA BUILDING CODE COUNCIL

1429 Rock Quarry Road, Suite 105

Raleigh, North Carolina 27610

April 29, 2024

RE: Support for the Adoption of 2024 ISPSC into the 2024 NC Residential Building Code

David Rittlinger and other Council Members,

I have recently retired from state employment as the Program Manager for the Public Pool Program. While I no longer have any regulatory responsibility or authority, I have been actively involved in regulating public pools for my entire career.

While residential pools and commercial pools are viewed completely differently, many of the same hazards exist with both. Numerous times during my career I have been involved in projects involving contractors who primarily work within the residential field. This exposure has led me to firsthand observation of the lack of consistency within the residential pool industry of nationally accepted building and safety practices.

While it has been the recent trend to reduce regulatory burden on the public, an acceptable set of national standards would be a way to better protect public health by building safer pools.

Please feel free to contact me if you have any questions.

Thank you for your time and consideration,

Alice Isley

Alice Isley, REHS, CPO

AliceinPKS@gmail.com

252-947-2579