



April 13, 2017

Mr. Brandon Comeaux E.I.,
Region 1 Engineer Intern
OPH – District 1

RE: Wax Museum Condominiums Class C Swimming Pool
New Orleans, Louisiana

Mr. Comeaux,

In response to your review comments sent via email dated April 4, 2017 regarding concerns about the subject pool plans, the following is provided:

1. *Your new comment to the original Comment #3*, Please add language to cover the entire pool and not just the floors. XXIV.301.B, "The floor of all pools shall be white, light colored, or light colored patterns in order to facilitate the identification of any objects within the pool. The color, patterns, or finishes of the pool interior shall not be such as to obscure the existence or presence of objects or surfaces within the pool." In order to interpret subjective language such as light colored please reference the MAHC 2nd edition, section 4.5.11.1.1 for more information.

Original Comment #3 from Ltr 3-21-2017, Please clarify if the Munsell scale rating of the pools finish will be at least 6.5 or greater. LAC.51 :XXIV.301.B. In part, "The floor of all pools shall be white, light colored, or light colored patterns in order to facilitate the identification of any objects within the pool." Model Aquatic Health Code 2nd edition, 4.5 .11.1.1, "The finish shall be at least 6.5 on the Munsell color value scale."

Original Response: Response: Note #3 on Sheet G-1.1 has been revised to state: " The floor of the pool shall be white, light colored, or light colored patterns.

Current Response: Note #3 on Sheet G-1.1 has been revised to state: " The shell of the pool shall be white.

2. *Your new comment to the original Comment #5*, Please have the architect provide design justification for not having the pool coping flush with a deck. In the justification please site applicable codes for the design.

Original Comment #5 from Ltr 3-21-2017, Please clarify if the deck will be sloped away from the pool to drainage or that the deck will allow for water to pass through to the floor drains underneath. Please reference LAC.51:XXIV.323.G, H, O, and P for more information.

Original Response: The 1-1/2" thick silica system above the 2' x 2' honed engineered stone pavers is a permeable system. Rain water and splashes from the pool will pass through the permeable silica system to the floor drains below. The surface of the concrete floor below will be sloped to a floor drain as shown on sheet PL-1.1.

Current Response: There are no applicable codes that have been violated when using the height of the decking. Hot tubs are often installed recessed with the top of the tub above the elevation of the decking.

3. *Your new comment to the original Comment #10, The cover chosen for the floor main drain is not rated for floor use by either the manufacturer or UL. The design provided has the skimmer removing flow from the main drains, which are on the wall, and the skimmer itself as shown in Hayward SP1084 Option 2. Provide documentation from the suction cover manufacturer which indicates if the suction cover requires a sump, which is a separate item, or if the design eliminates the need for an APSP -16 complaint sump (sumpless design). Please have the manufacturer address this issue for both the wall fittings and the floor fittings.*

Original Comment #10 from Ltr 3-21-2017, The equalizer line covers and the main drain cover provided are not VGBA APSP-16 2011 listed. The certificate of conformance shown is for cover model #SPC-3VP with wall flow rate of 251 gpm. The cut sheets provided were for cover model# SPC-3V / SPC-3MV with wall flow rates of 180 gpm. Please provide information that the covers chosen are VGBA APSP-16 2011 compliant. Also please provide additional information of the main drain sump to clarify that it is VGBA APSP-16 2011 compliant. Model Aquatic Health Code 2nd edition, 4. 7.1.6.1, "Submerged suction outlets, including sumps and covers, shall be listed and labeled to the requirements of ANSI/ APSP-16 2011."

Original Response: The manufacture has provided a blanket statement to the effect that all of their manufactured products meet the new requirements of ANSI/ APSP-16 2011, see attached.

Current Response: The drain device and cover in the floor of the pool has been revised, see attached. This drain does not require a sump. The two side main drains, see definition of main drain in "VIRGINIA GRAEME BAKER POOL AND SPA SAFETY ACT (as amended), dated December 2014; The term "main drain" means a submerged suction outlet typically located at the bottom of a pool or spa to conduct water to a recirculating pump." The term typically does not mean that all main drains must be located on the floor of the pool nor does it state at least one main drain will be located on the floor. The drain in the bottom of this pool is mainly to be able to drain the pool, since the side drains will be slightly above the finished floor elevation of the pool.

4. *Your new comment to the original Comment #12, The comment applies. The entire pool is shallow the LAC code states with distances as great as 15 ft. This implies for distances up to and including 15 ft. The pool parameter is 74 ft long with 2 return inlets. Thus there are 37 linear feet of pool wall for every intake.*

Original Comment #12 from Ltr 3-21-2017, The two return inlets for the pool both serve more than 15ft of pool parameter each. Please provide additional inlets to comply with code. LAC. 51 :XXIV.511.B.3, "In smaller pools when the distance across the shallow end is as great as 15 feet, multiple inlets at the shallow end shall be provided. These inlets must serve not more than 15 linear feet each. In spoon-shaped rectangular pools where outlets are located more than 5 feet from the end walls, inlets must be placed at both ends of the pool."

Original Response: Please refer to your comment above "In smaller pools when the distance across the shallow end is as great as 15 feet". This pool has no shallow end as the bottom of the entire pool is flat. The distance across the pool, not the length of the pool, is 10ft from the 1st step to the other side; therefore the statement above does not apply. The code requires a minimum of 2 inlets for small pools and 2 are being supplied.

Current Response: In addition to the original comment above: "The entire pool is shallow or is the entire pool is deep....." the quote in your Email of 4/4/2017 is an incorrect assumption. The words "....is shallow...." does not represent nor does it signify or is it synonymous with ".....the

shallow end....” as mentioned in the code. Having a shallow end implies that there is a deep end. So where is the deep end? Your flawed logic would require 5 return inlets. (74' / 15') The reality is that the pool bottom is flat, there is no shallow end, there is no deep end; the return inlets serve 10' sides on each end of the pool, the water mix return rate is satisfactory for this pool; two return inlets meet Louisiana State Code Requirements.

5. *Your new comment to the original Comment #15, LAC.715.A.1 only applies if underwater lighting is used. No underwater lighting was found in the submittal. For installations with no lighting please provide at least 2 watts/sqft of deck area for night time use. Alternatively please reference MAHC section 4.6.1.3 for further guidance.*

Original Comment #15 from Ltr 3-21-2017, Plans do not show that underwater lighting is used. Please confirm that the illumination values will meet the minimum foot candles as listed. Model Aquatic Health Code 2nd edition, section 4.6.1.3, "POOL water surface and DECK light levels shall meet the following minimum maintained light levels:

- 1. Indoor Water Surface: 30 horizontal footcandles (323 lux)*
- 2. Outdoor Water Surface: 10 horizontal footcandles (108lux)*
- 3. Deck: 10 horizontal footcandles (108lux)."*

Original Response: Note 27 on G1-1 states “ PER 715.A - THIS POOL WILL BE OPEN FOR USE DURING NON-DAYLIGHT HOURS, AND THEREFORE REQUIRES 0.5 WATTS OF LIGHTING PER SQUARE FOOT OF POOL AREA. THE DECK AREA LIGHTING SHALL BE PROVIDED WITH A MINIMUM OF 0.6 WATTS PER SQUARE FOOT OF DECK AREA”. Since this pool does not have an underwater light the surface of the pool water surface area will require 0.5 watts per sq ft. of lighting as required by the LAC code and the deck will requires 0.6 watts per sq ft. See note on sheet Pl-1.1 detail #3.

Current Response: You are correct in your interpretation of LAC.715.A in that the code does not require the use of an underwater light. Since the code does not directly require a certain amount of light inside the pool when an underwater light is not used, the wording on Note 27 of sheet G1-1 has been revised to meet the code’s performance requirements. Note 27 on G1-1 has been revised to state “ PER 715.A - THIS POOL WILL BE OPEN FOR USE DURING NON-DAYLIGHT HOURS, AND THEREFORE LIGHTING SHALL BE PROVIDED IN SUCH CONCENTRATION SO AS TO PERMIT A BLACK CIRCLE 6 INCHES IN DIAMETER ON A WHITE FIELD, WHEN PLACED ON THE BOTTOM OF THE POOL AT THE DEEPEST POINT, TO BE CLEARLY VISIBLE FROM THE DECK AROUND THE POOL AT ALL DISTANCES UP TO 10 YARDS MEASURED FROM A LINE DRAWN ACROSS THE POOL THROUGH THE SAID DISK.”

If you have any questions, or require additional information, please feel free to call.

Sincerely,



David Dammon, President
Dammon Engineering, Inc.

