

OKLAHOMA UNIFORM BUILDING CODE COMMISSION
SWIMMING POOL AND SPA
AD HOC COMMITTEE MEETING NOTES
UNIFORM BUILDING CODE COMMISSION CONFERENCE ROOM
2401 NW 23RD STREET, SUITE 82
OKLAHOMA CITY, OK 73107
WEDNESDAY, APRIL 29, 2026 – 9:00 A.M.

COMMERCIAL COMMITTEE MEMBERS PRESENT:

Jeff Birdwell, Dan Favata and Kyle Melson

RESIDENTIAL COMMITTEE MEMBERS PRESENT:

Todd Booze, Austin Horton and Clayton Thomas

OTHERS PRESENT:

David Adcock (OUBCC Staff), Kathy Hehnly (OUBCC Staff) and Caitlin Redding Taylor (OUBCC Staff)

CALL TO ORDER:

Discussion on Chapter 2 of the 2024 edition of the ISPSC®

Mr. Adcock opened the meeting and shared that it was made up of representatives from both the Commercial and Residential Swimming Pool and Spa Committees; including the Chairs, Vice Chairs, and Commission Liaisons. They would be reviewing code change proposals that both committees had addressed but still needed concentrated review and discussion at this meeting before formal action. It was clarified that no official action would be taken during the meeting and that all discussion items would later be returned to the respective committees for continued review and action.

Residential code change proposal RSPSTC-1 defining “Pool/Spa Surface”

There was discussion regarding proposed revisions to Chapter 2 definitions involving the term “pool or spa surface.” The proposal would add a definition describing the pool or spa surface as the material or assembly of floors and walls providing the waterproof barrier and finish. Concerns were raised that the language “waterproof barrier” was inaccurate because common pool finishes such as plaster and grout were not entirely waterproof. It was discussed that the proposal could create confusion and conflict with industry practice. The committee discussed whether resurfacing activities were already sufficiently addressed under the existing definition of “repair” in Section 202, which defined repair as reconstruction or renewal of any part of a pool or spa for maintenance purposes or correction of damage. It was stated that the existing definition was broad and potentially ambiguous because it did not specifically distinguish resurfacing from alterations or remodeling work. Concerns were raised that different code officials could interpret resurfacing activities differently, resulting in inconsistent enforcement.

There was discussion whether resurfacing a pool should trigger compliance upgrades for suction entrapment protection systems. The committee discussed the Virginia Graeme Baker Pool and Spa Safety Act and clarified that retroactive federal requirements primarily applied to commercial pools rather than residential pools. It was noted that new residential pools were already required

to comply with suction entrapment standards, but older residential pools with single drains remained common.

The committee discussed whether resurfacing work should require upgrading existing drains to comply with current anti entrapment requirements. Concerns were raised regarding the cost and extent of demolition required to install dual drains or channel drains in older pools. It was noted that many remodel projects already included replacement of drain covers with compliant anti-entrapment covers and installation of secondary safety devices such as safety vacuum release systems. The committee discussed life safety concerns involving older single drain systems and acknowledged that modern standards focused on preventing full body entrapment, hair entrapment, and excessive suction velocities.

The committee discussed the practical implications of requiring upgrades during remodels and resurfacing projects. It was stated that many residential remodels involved replacement of coping, tile, fittings, and plaster while retaining the original shell and plumbing configuration. Concerns were raised that mandatory structural modifications could introduce additional risks involving plumbing, bonding, rebar integration, and shell integrity. It was stated that many existing pools built in earlier decades contained undersized plumbing systems and blockable drains that would not comply with modern standards. The committee discussed that compliant drain covers had a limited-service life, commonly 5 years, because of ultraviolet and chemical degradation. There was discussion that current standards already required compliant replacement drain covers whenever covers were replaced.

The committee discussed two proposals further on the agenda; RSPSTC-2 modifying the definition of “Repair” and RSPSTC-4 adding on Section 311.2 “Existing Residential Pools and Spas Alterations and Repairs”. The committee discussed language that would require existing residential pools undergoing alterations or repairs to comply with ANSI/APSP-7 Suction Entrapment Avoidance requirements. It was discussed that the proposal was intended to improve life safety protections during remodel work without fully requiring complete reconstruction of older pools. The committee discussed that the proposed language addressed alterations and repairs broadly enough that additional definitions for resurfacing and pool surfaces might not be necessary.

The committee decided that the existing definition of “Repair” sufficiently addressed resurfacing activities and that the proposed additional definitions could be unnecessary and potentially confusing. It was agreed that revisions to Section 311.2 provided a clearer mechanism for addressing safety upgrades than adding new definitions within Chapter 2. The committee decided the best action would be to withdraw the proposed definitions related to “Resurfacing” as well as “Pool Surfaces,” and allow the broader “Repair” language to remain unchanged.

Residential code change RSPSTC-2 modifying the definition of “Repair”

The committee decided to allow the broader “Repair” language to remain unchanged and that the proposal should be withdrawn.

Residential code change RSPSTC-12 modifying the definition of "Residential Swimming Pool"

Discussion was held regarding proposed amendments to the definition of "Residential Swimming Pool" concerning pool sharing and revenue generating uses. The proposal's intent was to clarify that pools used for commerce, pool sharing, or similar revenue generating activities would no longer be considered residential pools and instead would be classified as public pools. Concerns were raised regarding increasing use of short-term rental properties, pool sharing applications, and hourly pool rental services. The committee discussed that residential pools were not designed or regulated for the high turnover rates associated with commercial style usage and that increased bather loads created concerns involving sanitation, circulation turnover, water treatment, supervision, and life safety.

The committee discussed differences between short-term home rentals and pool-only rental services. It was stated that Airbnb style rentals generally included access to the residence, bathrooms, and household amenities, while pool sharing services often involved rental of only the pool area without restroom access or other required commercial amenities. Concerns were raised that pool sharing services could involve numerous unrelated groups using a pool throughout the day, significantly increasing occupancy turnover and exposure risks. The committee discussed whether such uses should be classified as Class B public pools or Class C semi-public pools under the commercial code provisions.

There was discussion regarding the distinction between transient and non-transient occupancy classifications in the code, and how those concepts related to swimming pool use. It was stated that transient users were generally unfamiliar with pool safety systems, emergency shutoffs, and operational features. Concerns were raised that transient commercial use of residential pools could create increased liability and safety risks. The committee discussed that existing residential definitions referring to "guests" could be interpreted too broadly and allow commercial pool sharing operations to improperly claim residential status.

The committee discussed enforcement concerns involving pool sharing operations occurring within residential neighborhoods. It was stated that municipalities needed authority to regulate or prohibit unsafe commercial style operation of residential pools. The committee discussed that classifying pool sharing operations as public pools would require compliance with commercial pool safety provisions, restroom requirements, and operational standards. It was also noted that homeowner insurance policies might not cover commercial pool sharing operations unless specifically disclosed to insurers.

The committee discussed whether a new "Public Pool" classification should be created specifically for pool sharing operations. Concerns were raised that creating a new classification would require revisions throughout the entire code. It was suggested that existing "Public Pool" or "Semi-Public Pool" classifications could instead be modified to address these uses. The committee discussed allowing the commercial committee to develop revised language clarifying classifications for pool sharing and short-term rental pools before the next committee meetings. The committee agreed that the commercial committee would prepare revised language regarding pool sharing and residential rental pool classifications for consideration at future meetings.

Residential code change RSPSTC-3 defining “Resurfacing”

The committee recommended the proposal be withdrawn.

Discussion on Chapter 3 of the 2024 edition of the ISPC®

Residential code change RSPSTC-8 amending Section 306.2 “Slip resistant”

Discussion was held regarding Section 306.2 concerning slip resistant surfaces around residential swimming pools. The committee discussed concerns with new language added in the 2024 code requiring decks, ramps, coping, and similar surfaces to be slip resistant and cleanable according to referenced testing standards. Concerns were raised that the new provisions introduced subjective enforcement issues and unrealistic testing expectations for residential pool construction. The committee discussed that inspectors would have difficulty verifying compliance because many common materials lacked readily available testing documentation.

It was stated that many natural stone products, including travertine, did not include manufacturer testing reports for slip resistance because materials were imported and varied between shipments. The committee discussed that stamped concrete and similar decorative finishes might also fail to meet the referenced standards despite being commonly used around residential pools. Concerns were raised that the provisions could substantially increase residential pool construction costs and unnecessarily restrict acceptable decking materials. The committee discussed that residential pool users were generally familiar with their own pool environments and that residential pools should not necessarily be regulated to the same standard as commercial pools. The committee agreed that the residential committee would prepare revised language for consideration at future meetings.

Residential code change RSPSTC-4 adding on Section 311.2 “Existing Residential Pools and Spas Alterations and Repairs”

The committee agreed that proposed changes to Section 311.2 requiring existing residential pools and spas undergoing alterations or repairs to comply with ANSI/APSP-7 suction entrapment requirements were acceptable, while related resurfacing and pool surface definition changes in Chapter 2 would instead be withdrawn.

Commercial code change CSPSTC-3 amending Section 314.4 “Location”

The committee discussed amending Section 314.4 “Location” to require pumps and motors to be provided with a clear space of not less than 18 inches for inspection and servicing access. It was stated that the proposal had primarily been intended for commercial pools to align with existing Oklahoma State Department of Health requirements and to provide technicians with adequate working space around equipment. Concerns were raised that the proposal could create unnecessary restrictions for residential pool equipment installations where manufacturers had designed systems for tighter equipment layouts, and many residential heaters and equipment systems were specifically manufactured to minimize equipment pad sizes while still complying with manufacturer installation requirements.

The committee discussed that existing manufacturer specifications, electrical workspace requirements, and combustible clearance requirements already addressed equipment access in many situations. It was noted that the electrical code already required workspaces and access clearances in some cases, including pathway and servicing requirements. Questions were raised regarding whether the proposed language in Section 314.4 duplicated existing code provisions and whether additional language was necessary.

The committee discussed modifying the proposal to apply only to commercial or public pools by creating a separate subsection under Section 314.4.1. The committee discussed revising the language to specifically reference public pools rather than applying the requirement broadly to all residential and commercial pool equipment installations. It was stated that the Department of Health would still maintain separate commercial pool requirements even if the proposal was withdrawn.

The committee discussed the proposed amendment might be unnecessary because manufacturer installation instructions and existing code requirements already governed equipment clearances. It was recommended that the commercial committee consider withdrawing the proposal.

ADJOURNMENT: (10:52 A.M.)

PREPARED BY: _____

Caitlin Redding Taylor, Commercial Swimming Pool and Spa Technical Code Review Committee
Secretary