Summary of TRC Email Agenda for 6/16

The following is a summary of email-based discussions for Change Requests (CRs) addressed by the Technical Review Committee (TRC) for the week of 6/16/20. These CRs were discussed by email, with votes being cast starting 6/23/20.

Due to the number of CRs to be evaluated, the TRC decided on the 6/8 call to return some CRs to an email agenda. CRs addressed in this summary were CRs moved from a call schedule to this email agenda and are generally considered by the TRC as non-substantive.

To ensure that all CRs are adequately reviewed, the TRC reserves the right to revisit any CR reviewed via email, even if a vote has been cast. The TRC will also examine all Abstain votes to ensure that proper attention has been given to each CR. Additionally, any TRC member can initiate the revisiting of a CR reviewed via email without a consensus vote. In this occurrence, the CR in question will be revisited by the TRC during the normal call schedule and a new vote cast.

4.9.2.2.2-0001

This CR modifies the language to remove the text “against tampering, wild fires, unintended exposure to water, etc.”

The TRC felt that the examples listed covered the three primary factors, although questioned the use of “wild fires” instead of ignition sources, and were not in favor of removing the examples. They did however feel that the section could be revised slightly to highlight these three factors but leave room to include others. The CR champion will send the following proposed modified language to the CR submitter, and this CR will be revisited on the June 29 TRC call. The construction of the CHEMICAL STORAGE SPACE shall, to the extent practical, protect the STORED materials against factors including, but not limited to tampering, sources of ignition, and unintended exposure to water. Against tampering, wild fires, unintended exposure to water, etc.

In a response from the submitter, it’s stated “Looking at section 5.9.1.11 of the MAHC for storage it notes "Chemicals shall be stored away from direct sunlight, temperature extremes, and high humidity" That is difficult to achieve if the design/construction did not also address these requirements under section 4.9.2.2.2. Looking at CDC’s Recommendations for Preventing Pool Chemicals Associated Injuries it also mentions direct sunlight, high temperature, and high humidity but also to protect from getting wet, heat sources and flames, and incompatible chemicals.

I’ve also reviewed the SDS for storage requirements for one chemical, sodium hypocrite (attached) which is commonly used in pools. The safe storage conditions notes:

• Store in a cool, dry area
• Store out of direct sunlight
• Store in a well ventilated area
• Avoid heat, flame, sparks, and other sources of ignition
• Protect from freezing
• Keep separated from Incompatible materials
• Store in a secure manner

I do not support the change proposed by the TRC as it appeared arbitrary simply changing "wild fires" to "sources of ignition" and does not address important areas including protection against extreme temperatures, direct sunlight, high humidity, and incompatible materials.

The submitter continues, “As it is clear the TRC wanted to keep a list I would propose changing the language as follows:

4.9.2.2.2 Protected The construction of the CHEMICAL STORAGE SPACE shall, to the extent practical, protect the STORED materials against tampering, wild fires, unintended exposure to water, etc. incompatible chemicals and materials, high humidity, unintended exposure to water, direct sunlight, sources of ignition, and temperature extremes (i.e. 32 F and below and/or over 95 F)

*The TRC has recommended a Yes vote for this CR.*

4.9.2.3.2-0001 – Text Change:

This CR modifies the language to be consistent with the definition of ENCLOSURE.

*The TRC has recommended a Yes vote for this CR.*

4.9.2.4.2-0001:

This CR seeks to remove language requiring an emergency egress device where a single door is the only means of egress from a CHEMICAL STORAGE SPACE. The submitter comments “Emergency egress requirements are addressed in building codes/fire codes and enforced by building/fire code officials” and that it is “Unnecessary to include an additional requirement in MAHC”.

*The TRC was unable to find consensus and abstains for this CR.*

4.9.2.4.4-0001:

This CR adds clarifying language. The submitter notes that the current entry is “confusing as written.”

*The TRC was unable to find consensus and abstains for this CR.*
4.9.2.4.5-0001
This CR modifies this section to add clarity. The submitter notes “As originally written it is confusing with direct reference to its subparagraphs. More clear and concise to keep within a single sentence without the subparagraphs.”

The TRC was unable to find consensus and abstains for this CR.

4.9.2.4.5.6.1-0001
This CR seeks to remove language the submitter deems unnecessary. The submitter comments “... section 4.9.2.4.5.6 already requires the automatic door closer will completely close the door and latch without human assistance.”

The TRC was unable to find consensus and abstains for this CR.

4.9.2.4.5.7-0001
This CR seeks to remove language for limit switch. The submitter states “Why alarm after 30 minutes? Already requiring automatic locks and closer so door should never remain open. If someone is blocking the door open the hazard begins immediately not after 30 minutes. This appears to make it acceptable to prop the door open.”

The TRC recommends a No vote for this CR.

4.9.2.5.2.3.1-0001
This CR seeks to remove references to exhaust airflow rate as compared to OSHA and the International Mechanical code. The submitter states “Each of these references are under separate jurisdiction and enforcement authority from the pool program. The pool program can ensure that room is under a negative pressure but other regulations would dictate the airflow rate which also includes Fire Code such as IFC where hazardous chemicals are stored and used.”

The TRC was unable to find consensus and abstains for this CR.

4.9.2.5.2.4-0001:
This CR seeks to remove language regarding exhaust system monitoring. The submitter states “The requirement for ventilation of chemical storage areas are addressed in other code based on the types and quantities of chemicals present. I am not aware of other pool codes or pool rules addressing alarming of chemical room pressurization.”

The TRC recommends a No vote for this CR.

4.9.2.6-0001, 4.9.2.7-0001, 4.9.2.8-0001, 4.9.2.9-0001:
These CRs seek to remove various references. In the comments for each of these CRs, the submitter states “Other codes address requirements....[the submitter references the specific aspect addressed by each of these code references within the individual entries]. I am not aware of other pool codes containing these type of requirements as they would be redundant and better addressed in building/fire/mechanical codes.”

*The TRC recommends a No vote for these CRs*

**4.9.2.13-0001:**

This CR seeks to remove 4.9.2.13 Sealing and Blocking Materials. The submitter states “This is unnecessary and best addressed in building and fire codes. I am not familiar with another pool code or pool rules that provide requirements for sealing and blocking materials.”

*The TRC recommends a No vote for this CR.*