

NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor
DEVPUTTA SANGVAI • Secretary
KELLY KIMPLE • Acting Director, Public Health

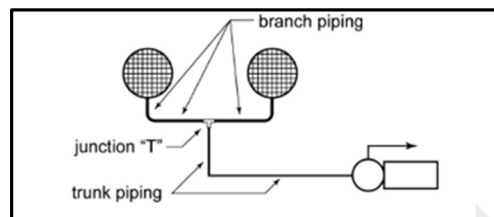
November 13, 2025

POSITION STATEMENT

TO: Registered Environmental Health Specialists, Program Supervisors, and Managers
SOURCE: Chad Gambill, Pools, Tattoos, and State Institution Program
SUBJECT: Symmetrical "T" piping Clarification - Rule .2518(j)(1)

CLARIFICATION SUMMARY:

For dual blockable SOFA configurations, permits should not be denied if the construction deviates from the plans with regards to the location of the "T" junction, so long as the T remains between the two SOFAs. The length of the branch piping on either side of the T does not have to be equal for VGBA compliance in a dual blockable SOFA configuration as shown in the diagram below. For purposes of .2518(j)(1), the connection will be considered symmetrical if the components on either side of the "T" are the same. **Any location of the T between the two outlets is considered compliant with .2518(j)(1) and the VGBA in a dual blockable SOFA configuration.**



DISCUSSION AND RATIONALE:

NC Rules Governing Public Swimming Pools 15A NCAC 18A .2500 incorporate ANSI/APSP/ICC 16 2017 (APSP 16) and ANSI/PHTA/ICC 7 (PHTA 7) by reference. These two standards are developed and maintained by the Pool and Hot Tub Alliance (PHTA). APSP 16 is also incorporated by reference into the Virginia Graeme Baker Pool and Spa Safety Act (VGBA) by Section 1404 of that federal law.

On July 1, 2025, the PHTA issued the following clarification regarding the location of the T in a dual blockable drain configuration. This PHTA clarification can be viewed at PHTA.org.

3. Policy Clarification on Tee Location for Dual Drains:

Because all manufactured SOFAs intended for multiple drain use are tested as single outlets, the ANSI/APSP/ICC-16 2017 Standard and the ANSI/PHTA/ICC-7 2020 *American National Standard for Suction Entrapment Avoidance In Swimming Pools, Wading Pools, Spas, Hot Tubs and Catch Basins* does NOT specify or require any specific location for the tee in a two-outlet configuration. Any location between the two outlets is permitted. All SOFA manufacturer instructions must also be followed. A tee placed within the 16-inch hair-reach zone is compliant.

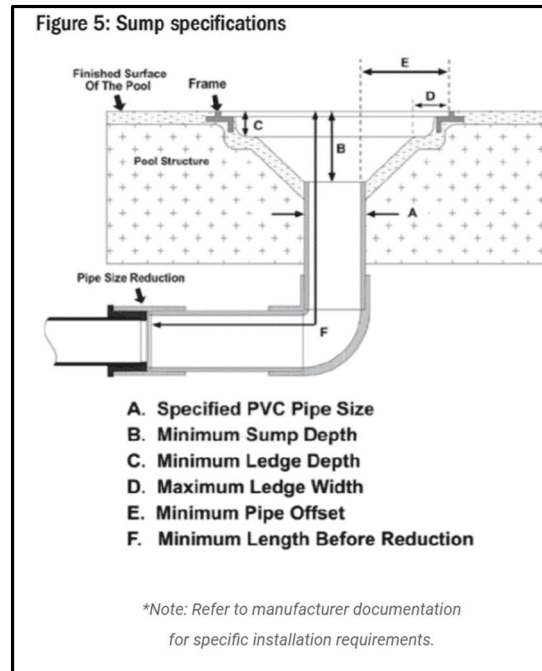
NC DEPARTMENT OF HEALTH AND HUMAN SERVICES • DIVISION OF PUBLIC HEALTH

LOCATION: 5605 Six Forks Road, Building 3, Raleigh, NC 27609
MAILING ADDRESS: 1931 Mail Service Center, Raleigh, NC 27699-1931
www.ncdhhs.gov • TEL: 919-707-5000 • FAX: 919-870-4829

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

Rationale for the PHTA clarification

The rationale for the PHTA clarification is that in a dual blockable drain configuration, each SOFA is rated to handle 100% of the pumping system's maximum system flow rate. Therefore, no matter where the T is located between the SOFAs, the manufacturer's SOFA flow rate will never be exceeded by the maximum system flow rate. For a dual blockable SOFA configuration, this remains true even if one of the dual drains is completely blocked and the T is installed close enough to the remaining unblocked drain to be within the tested SOFA dimensions (see dimension F in Figure 5 from APSP 16 copied below).



Dimension F in the diagram above is specified by the cover/grate manufacturer for VGBA 2017 SOFAs based on hair entanglement testing and defines the minimum length of pipe before any reduction in pipe diameter is allowed.

The July 1, 2025 PHTA clarification does not apply to SOFA configurations with two or more unblockable SOFAs and/or configurations with three or more blockable SOFAs. The PHTA Standard Writing Committee has indicated that they are working toward consensus on these other SOFA configurations, and they hope to publish guidance within the next six months.

If you have a rare or unusual situation and have questions about the application of this guidance, please reach out to your regional specialist.

REFERENCES: (The referenced PHTA standards are available to read or purchase at PHTA.org)

ANSI/PHTA/ICC-7 2020

ANSI/APSP/ICC-16 2017

15A NCAC 18A .2500

PHTA.org - <https://www.phta.org/standards-and-codes/phta-standards/purchase-or-read-phta-standards/phta-16/>

This guidance replaces any guidance given in previous written or verbal communications. NOTE: Position statements are policy documents to clarify how to interpret or enforce a law or rule. They are not enforceable on their own but are intended to promote uniform interpretation and enforcement of the underlying law or rule.