

## EXPLANATION OF TITLE 22 AND HOW TO COMPLY

There has been a lot of confusion about Title 22 on Operation Records and how the industry can comply. First there has been no real change in the code. Second the code does not require a chemical controller. Then what is all the discussion about and why all the confusion. First let us start with what the code states. The following is the excerpt from the code:

### 65523. Operation Records

(a) Except as provided in Health and Safety Code, section 116048, the pool operator of every public pool open for use at a public pool site shall test the disinfectant residual and pH of the public pool water a minimum of once per day. The pool operator shall also test heated pools' water temperature a minimum of once per day. The pool operator may perform these daily tests using a properly calibrated automatic chemical monitoring and control system if approved by the enforcing agent and in accordance with the manufacturer's equipment specifications for calibration and directions for proper use. The pool operator shall maintain a **written** daily record of all test results, equipment readings, calibrations, and corrective action taken at the public pool site.

(b) If the pool operator adds cyanuric acid to a public pool, the pool operator shall measure the cyanuric acid concentration in that pool a minimum of once per month and shall maintain a **written** record of these test results and all corrective action taken at the public pool site.

(c) The pool operator shall test combined chlorine at a frequency required to maintain maximum combined chlorine concentrations below 0.4 ppm. The pool operator shall maintain a **written** record of

these test results and all corrective action taken at the public pool site.

(d) The pool operator shall maintain a **written** record of routine maintenance and repairs to the public pool at the public pool site.

(e) If a fecal, vomit, blood contamination, near-drowning, or drowning incident occurs in a pool, the pool operator shall record the incident in accordance with the requirements of section 65546 and shall identify the affected public pool in the incident record if there is more than one pool at the public pool site. This record shall be maintained at the public pool site.

(f) The pool operator shall maintain data and records collected pursuant to subdivisions (a), (b), (c), (d), and (e) for at least two years for inspection by the enforcing agent and shall submit all data and records to the enforcing agent upon the agent's request.

Note: Authority cited: Sections 116048, 116050 and 131200, Health and Safety Code. Reference: Sections 116035, 116040, 116043, 116050 and 116055, Health and Safety Code.

Now what does this mean? First the Health Department wants the pool water to be tested with an approved test kit each time the pool is serviced. We all know that most commercial pools in California are maintained by a service company and not serviced daily. The Health Departments know this. They are willing to work with the industry and this is how.

During a meeting with many of the local County Health departments, including LA County and Orange County in Santa Ana an understanding was reached. The following is what was discussed and agreed upon:

1. The Health Departments want a **WRITTEN** daily record that indicates the reading for PH, Disinfectant Level and the Temperature of the pool if the pool is heated.
2. The Health Department wants the water tested with an approved test kit each time the pool is serviced. Then the reading recorded on the **WRITTEN** record
3. On the days the pool is not serviced, the Health Department will allow the use of the daily reading that comes from a NSF 50 Approved Chemical Controller. This will prevent “voids” in the daily **WRITTEN** record.
4. The Health Department wants the Disinfectant levels to be placed on the record in **PPM**. The Health Department will allow either a DPD method or a calculated method when displaying the Disinfectant level on the Chemical Controller.
5. The Health Department wants the Chemical Controller to be able to store up to 30 days of data. That way if there is a question about the accuracy of the **WRITTEN** record, the department can request a printed copy of the last 30 days of data to be compared with the **WRITTEN** record.

Pentair’s AK 110 meets or exceeds all of these agreed to requirements and according to LA County is Title 22 “Ready”. The AK 110 can provide a “calculated PPM” reading or can provide a true PPM reading using the “DPD” method. However the Health Departments know that the AK 110 using ORP will automatically adjust the ORP reading for high or low PH and high or low cyanuric acid. That means the “calculated method” will provide an accurate indication of how effective the sanitizer in the water is working. Studies have shown high levels of cyanuric acid slows down the kill rate of microorganisms and we all know as the PH increases the ORP decreases. Thus the sanitizer level will indicate lower.

If you have any more questions about Title 22 please contact your Pentair sales representative.