

What Is Happening With CA Title 22?

California Title 22 came into effect January 2015 and there is still a lot of confusion about how it effects commercial swimming pools.

By law, a public pool is required to have Free Chlorine residual, pH and if heated, the temperature to be tested and recorded daily. Some counties require this to be done manually, some are allowing modified schedules, some allow for automated compliance which is allowed in the code and some are not enforcing at this time.

I have seen many health departments struggling with an enforcement plan due to limited staff and high turnover. For those allowing automation I have seen some systems which are ORP & pH controllers with and without temperature monitoring being touted as Title 22 compliant. Some of these controllers are calculating or “guessing” Free Chlorine levels based on ORP & pH which is usually not right especially when cyanic acid is being used. Some manufacturers are putting Title 22 compliant on their literature and have been getting approved. This could be a slippery slope and potentially a legal nightmare.

Currently, there are only two methods of reliably monitoring Free Chlorine. Colorimetric DPD testing and selective membrane Free Chlorine sensors. Both methods have their pluses and minuses. Both can be reasonably accurate when set up and used properly. There are also varying hardware and maintenance costs associated with each method.

ControlOMatic has consulted with numerous health officials in an effort to build in features that will help in compliance for all counties, while keeping cost of compliance down. We are the only manufacturer that has the ability to monitor 1 or 2 pools with one system using automated Colorimetric DPD which emulates the manual hand test. We also have a feature which makes the last 7 days of daily ORP, Free Chlorine residuals, pH and temperature easy to retrieve. The information can also be printed on a tape and attached to the pool log with an optional printer.

In order to prevent planned obsolescence and changing requirements, ControlOMatic has made software and hardware upgrades available in the field so you only get what you need in your particular area. Our systems also have the ability to provide proactive notifications so if a pool or spa has a chemical or flow problem, it can be corrected before things get unhealthy.

Until local health departments can get to the point of deciding exactly how they will enforce Title 22 there will still be confusion. This has proven to be more challenging than VGB compliance where once approved solutions were suddenly withdrawn and people had to start all over.

Unless the law is repealed or amended, Title 22 requires us to test Free Chlorine residual, pH and temperature at least once daily.

As pool professionals, we are required legally to maintain known standards regardless of the local health departments to protect ourselves and clients from liability.