
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2022-28-[675 IAC 20-2-7\(b\)](#)

Building or Fire Safety Law Interpreted

[675 IAC 20](#) Indiana Swimming Pool Code, Section 20-2-7, Depths

(b) Class B and C swimming pools shall have a minimum depth of water in the shallow end of the main swimming area of three (3) feet. Advisory note: Three (3) feet six (6) inches is the minimum recommended depth for racing lanes. Exception: Recessed areas of an irregularly shaped pool.

Issue

Whether Section 20-2-7(b) of the *Indiana Swimming Pool Code* (ISPC) prohibits a depth of four (4) feet at the shallow end of the main swimming area of a Class B or C swimming pool.

Interpretation of the State Building Commissioner

No, Section 20-2-7(b) of the *ISPC* does not prohibit a depth of four (4) feet at the shallow end of the main swimming area of a Class B or C swimming pool.

Rationale

Section 20-2-7(b) does not state that the shallow end of the main swimming area in Class B and C pools shall *be* three feet. It says the *minimum* depth of that area of the pool shall be three feet.

The fact that a dispute exists over the acceptability of a depth greater than three feet suggests there is some confusion over the meaning of the word "minimum" in this usage, so we will examine it, beginning with its definition. Since it is not defined in the code, we turn to its customary meaning. The Merriam-Webster online dictionary defines the term as "The least quantity assignable, admissible, or possible" (<https://www.merriam-webster.com/dictionary/minimum>, last viewed August 15, 2022).

If a stated quantity is presented as "the least quantity admissible", then logic dictates that a quantity greater than the stated minimum is acceptable. This is what the disputed regulation is saying. It could also be phrased as "the depth of water at the shallow end of the main swimming area of Class B or C pools shall be no less than three feet.". The meaning is the same.

To suggest the regulation requires the depth of the shallow end to be precisely three feet would (a) require an unnecessarily complex application of grammar and syntax; (b) require a regulation placing the general minimum required depth at three feet throughout the pool; (c) require wording that the shallow end shall have the minimum depth of the pool; and (d) completely eliminate the possibility of utilizing the advisory note's suggested depth of three feet six inches for racing lanes.

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