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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2023-01 [[675 IAC 20-2-22](#)(d)]

**Building or Fire Safety Law Interpreted**

[675 IAC 20-2-22](#)(d) **Indiana Swimming Pool Code, Electrical, mechanical, and illumination requirements.**

(d) Heaters shall be installed and tested to comply with the requirements under [675 IAC 25](#), the Indiana Fuel Gas Code for gas applications or [675 IAC 17](#), the Indiana Electrical Code for electrical applications.

**Issue**

Whether Section 20-2-22(d) of the *Indiana Swimming Pool Code* (ISPC) requires installation of a pool heater in a public pool.

**Interpretation of the State Building Commissioner**

No, Section 20-2-22(d) of the *ISPC* does not require the installation of a pool heater in a public pool.

**Rationale**

The dispute in this instance is whether the rule requires the installation of a heater in public pools, or whether it only provides that if a heater is installed, it must be done in compliance with the fuel gas or electrical codes as applicable, and tested to demonstrate such compliance.

The grammatical construction of the disputed rule is such that it can be read with two different meanings, producing different results. Other rules in the same article (regarding both features that are clearly mandatory and those that are clearly optional) are inconsistent in their wording, preventing the reader from utilizing word choice, sentence construction, and syntax to accurately discern intent across the article's contents.

Research into the article's adoption, however, indicates it was not the intent of the rule to require heaters in all public pools, but to prescribe required means and methods for installation of heaters when they are provided.

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