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PRACTICE TIPS FOR MAINTAINING AND OPENING PUBLIC POOLS AND HOT TUBS

PRACTICE TIPS FOR MAINTAINING AND OPENING PUBLIC POOLS AND HOT TUBS



INTRODUCTION:

Virtually all public aquatic facilities in the country have been closed by State Executive Order due to COVID-19. A number of states and local jurisdictions have or are in the process of issuing directives easing stay at home restrictions. While we await these orders, pool owners, pool operators and pool management companies should 1) ensure that their facilities continue to be properly treated and maintained, 2) develop a plan for reopening, and 3) start to develop a Compliance Plan, addressing the social distancing and cleaning requirements that are expected to be contained in new or amended State Orders and/or guidance from state or local entities.



Reopening any business or establishment in these times is not without some risk to staff and members/guests. Permission to open also does not necessarily mean that a given facility must or even should reopen. Each facility must decide whether opening under the specific constraints of a given order with continued guidance from the Centers for Disease Control and Prevention (CDC) is technically, logistically and financially feasible. While properly treated pool water is not considered a vehicle for transmission of the COVID-19 virus, the risk of transmission remains present at any place of work, and any recreation facility. Therefore, social distancing must be maintained at all times between staff, between guests and between staff and guests. Hand washing and sanitization and regular cleaning and disinfecting of objects and surfaces are equally essential.

Reopening a facility, even when expressly permitted, is not without risk to staff and members/guests.

Additional considerations may be warranted before opening water parks and features such as wave or lazy river pools. For further guidance, see: https://www.waterparks.org/web/Resources/COVID-19/web/TaggedContent/Hot_Topics/Coronavirus.aspx?hkey=058be8d3-21ea-4ff9-9a9d-720d6a5b1d4d.

At the Pool and Hot Tub Alliance (PHTA) we are doing our best to monitor the situation and provide updates as time and resources permit. Below are some practical tips developed in consultation with PHTA member companies, other relevant associations and groups, as well as information stemming from the CDC, Environmental Protection



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Agency (EPA), Food and Drug Administration (FDA) and various state and local authorities. Specific measures will vary depending upon the specific Order permitting reopening, the state and/or local Department of Health regulations and the design and configuration of the facility. No measure provides a guarantee against COVID-19 transmission, or the potential liability that may arise as a result. By considering these measures, however, facilities can provide essential levels of protection, mitigating the risk as much as is feasible, while providing valuable recreational and educational services to their membership and community.

Additional guidance from the CDC regarding pool operation (and from the FDA regarding food service) is also anticipated and would take precedence over any PHTA recommendations.

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DISCLAIMER:

By accessing this document you are agreeing that 1) the document does NOT constitute legal advice, 2) that neither PHTA nor its employees, retained professionals or volunteer members are liable in any way for any inaccuracies or errors in this document, or for any damages allegedly incurred as a result of any claimed reliance on this document.

ALL MEMBERS ARE ADVISED TO SEEK THEIR OWN LEGAL COUNSEL, AND/OR SPECIFIC GUIDANCE FROM SAFETY EXPERTS AND THE APPROPRIATE GOVERNMENT AUTHORITIES.

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WHILE AWAITING ORDER PERMITTING REOPENING

- A.** Secure the premises to prevent access
- B.** Continue operation of circulation equipment where water is present
 - i. Some jurisdictions may advise or permit a reduced flow rate when closed if system is designed to accommodate it.
- C.** Continue regular inspections by a Certified Pool Operator (CPO)
 - i. Monitor water quality and balance, consulting State or Local code for required residual levels (See PHTA guidance on proper maintenance)
 - ii. Monitor filter pressure and backwash as needed
 - iii. Turn off heater
 - Turn off any secondary disinfection systems and maintain systems according to manufacturer instructions
- D.** CDC strongly encourages steps be taken to keep Legionella and other bacteria from growing, as extended closures of hot tubs/spas could create favorable conditions if not properly cared for to maintain water quality during closure or properly closed down. See the following CDC guidance:
 - <https://www.cdc.gov/healthywater/swimming/aquatics-professionals/extended-hot-tub-closures.html>
 - <https://www.cdc.gov/healthywater/swimming/aquatics-professionals/operating-public-hot-tubs.html>
 - https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html?deliveryName=USCDC_248_DM25447
- E.** Examining equipment regularly to ensure readiness
- F.** Maintain communication with staff to ensure readiness
- G.** Identify additional needs based on anticipated orders
- H.** Maintain communications with your membership and community
- I.** Be ready to open quickly when restrictions are lifted even if at limited capacity. This will likely reduce time needed to gear up for increased capacity when permitted
- J.** Be patient. Do not open your facility before federal, state and local guidelines allow
 - i. Contact the Authority Having Jurisdiction (AHJ) to schedule inspections as soon as possible. Many departments are working with limited staff and resources
 - ii. Note that some jurisdictions require pools to be drained for inspection
- K.** Review your insurance policies with your insurance professional and/or legal counsel. Many general and premises liability exclude coverage for injury from a communicable disease.

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ONCE AN ORDER EASING RESTRICTIONS IS ISSUED

- A.** Evaluate all aspects of the Order along with continuing restrictions from prior Orders with regard to:
 - i. Date of permitted opening
 - ii. Restrictions on capacity
 - iii. Distancing requirements (this may warrant lower capacity)
 - iv. Staffing requirements
 - v. Signage requirements
 - vi. Screening requirements for staff
 - vii. Screening requirements for public use
 - viii. Other health and sanitation requirements
 - ix. Inspection and verification requirements
 - x. Additional rules governing food service
 - Products permitted
 - On premises consumption
 - Preparation and packaging
 - Self service
 - Spacing of patrons, when waiting in line, when ordering and eating, if permitted
 - xi. Contact the source of the Order and/or consult a legal professional with any questions
- B.** Evaluate the economics. Make sure it makes financial sense to reopen at that time, maintaining safety for staff and guests and without cutting corners.
- C.** Evaluate readiness for facility inspection and opening
 - i. Water quality
 - ii. Equipment

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AS YOU PREPARE TO REOPEN

- A.** Full inspection by Certified Pool Operator of all systems and water quality
- B.** Schedule orientation for new and returning staff to include COVID/compliance issues
- C.** Re-establish normal operating conditions
 - i. Pump flow rates
 - ii. Heat
 - iii. Chemical balance
 - iv. Secondary disinfection systems

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- D.** Finalize your Compliance Plan, addressing how you will comply with the Order, any State or Local Health Department guidance/requirements, as well as with CDC guidelines. Issues include:
- i. ESTABLISH CAPACITY:** Determine capacity based on the AHJ Order and social distancing requirements, and the facilities pool, spa and deck, restroom and locker room configurations.
 - a. Examine your aquatic vessels to determine whether they can accommodate the permitted bather load while maintaining distancing requirements. If not, determine reduced load based on square footage, zones, lanes etc.
 - 1. Consider square footage needed per bather to maintain 6 feet separation while moving in the pool
 - 2. Consider lane widths in lap pools
 - 3. Consider capacity based on deck space (6 feet spacing in all directions from each chair would mean 1 chair per 160-170 square feet of deck space or per 15 linear feet of deck, depending in size of chairs)
 - 4. Recognize potential need to evacuate pool in determining capacity
 - b. Space furniture in accordance with distancing requirements (see above calculations)
 - 1. Consider marking furniture locations or anchoring chairs to tables etc.
 - c. Establish a schedule with time slots for various activities and allow sign ups online and/or by phone
 - d. Consider establishing and marking zones or sections of the pool to maximize separation
 - e. Allow sufficient time between activity periods to clean pool deck and locker rooms
 - f. Establish safe places for guests to await their turn while remaining apart
 - g. Consider separate entries and exits
 - h. Consider Impact on programs – recreational swim, water exercise, lap swim, swim lessons, swim team practices. Develop a plan on if and how for each.
 - 1. Swim competitions not recommended while social distancing requirements are in place
 - i. For non-guarded pools determine how mandated capacity limits and access will be monitored considering
 - 1. Screener at pool entrance
 - 2. Video

Finalize your Compliance Plan, addressing how you will comply with the Order, any State or Local Health Department guidance/ requirements, as well as with CDC guidelines.

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ii. SIGNAGE:

- a. Identify and consider necessary signage
- b. Signage should be located at point of entry to facility and in pool area
- c. Signage should
 1. Indicate Capacity
 2. Require Social Distancing at all times
 3. Identify COVID-19 symptoms and prohibit access to anyone with symptoms
 4. Require handwashing or use of hand sanitizers before entering pool area.
 5. Identify location of handwashing and sanitization stations
 6. Require wearing of cloth face masks or coverings when not in the pool
 7. Provide CDC recommendations as to medical conditions of guests:
Per CDC recommendations: "if you or anyone in your household is experiencing symptoms of COVID-19, you should stay home until the CDC's published isolation criteria are met"
 8. Warn patrons of risk of transmission under controlled conditions
 9. Require full compliance with all staff instructions
 10. Prohibit congregating anywhere in the facility
 11. Require adult present for children, and in close proximity for small children and non swimmers
 12. In unstaffed pools, instruct patrons to clean and disinfect any chairs or other surfaces before using

iii. CONTROLLING ACCESS:

- a. Establish social distancing in entrance areas or in lobbies for indoor facilities.
 1. Marking 6 feet part, including 6 feet distance from desk
 2. Plexiglass at front of check in desk
 3. Separate any seating in waiting area
- b. Determine how capacity will be enforced
- c. Consider use of a single entry to facility and/or pool
- d. Consider how or if you will swim test guests
- e. Identify areas that may need to be closed off
 1. Determine if showering is permitted or must be done at home
- f. Determine how employees will be screened for COVID-19 symptoms
 1. Sample set of questions to ask at entry from United States Swim School Association (see letter h. on next page)

Provide CDC recommendations as to medical conditions of guests: Per CDC recommendations: "if you or anyone in your household is experiencing symptoms of COVID-19, you should stay home until the CDC's published isolation criteria are met"

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- g. Consider use of COVID related waiver or adding COVID language to existing waiver
1. NOTE: enforceability of waivers varies by jurisdiction. Waivers are NOT a substitute for sound policies and procedures and do not provide a guarantee against lawsuits and adverse findings.
- h. Determine how Guests will be screened for COVID-19 symptoms
See CDC Signs and Symptoms Consistent with COVID-19 <https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-us-settings/guidance-identify-hcw-patients.html>
NOTE: The CDC has not mandated taking an employee's temperature and any operator who chooses to do so should engage health officials first and adopt policies aligned with proper procedures. CDC guidance states the minimum temperature that indicates a fever is 100.4°F. State Orders may require additional screening beyond CDC recommendations.
1. See Sample questions from United States Swim School Association:
 - Have you been ill with fever, chills, cough, or body aches in the past 14 days?
 - Has anyone in your household had these symptoms in the past 14 days?
 - Have you or anyone in your household traveled internationally in the last 14 days?
 - Have you or anyone in your household traveled to a location in the United States where an increased incidence of COVID-19 has been reported in the last 14 days?
 - Have you been told by a healthcare provider that you should self-quarantine due to a potential COVID-19 exposure or are you suspected of having COVID-19?
 - If your answer to any of these questions is yes, consider seeking medical advice and self-quarantine. Notify your supervisor that you will not be able to work.

iv. DETERMINE HOW DISTANCING WILL BE MONITORED AND ENFORCED.

- a. This CANNOT be the responsibility of any on duty lifeguard.

Consider the use of a COVID-related waiver or adding COVID language to an existing waiver.

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v. STAFFING:

- a. Identify any additional staffing requirements to assist in monitoring social distancing
- b. Ensure certifications are current
 1. Check with certifying bodies to determine if lifeguard and CPR certifications may be extended beyond current expiration. NOTE: The American Red Cross has created an online 120-day extension that any lifeguard can obtain.
 2. Check with authority having jurisdiction to confirm they will accept any extension or modified training.
- c. For lifeguard training follow guidance from applicable certifying or training organization.
- d. Consider hands free check-in for staff
- e. Provide Personal Protection Equipment for Staff (CDC Mask Info: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>)
- f. Lifeguards must not have any other responsibilities during a shift.
 1. Consider presence of additional staff to enforce distancing,
 2. cleaning either between shifts or by others

vi. PERSONAL PROTECTIVE EQUIPMENT

- a. Ensure adequate supply and reliable source for facemasks, eye protection and gloves
- b. Provide each lifeguard with their own PPE along with instructions on usage, cleaning and storage
 1. Eye protection; ideally full-face shield. Eyeglasses are insufficient protection.
 2. N95 respirator use when providing care to all suspected and confirmed COVID-19 patients. Note: If N95 masks are not available, a simple surgical mask should be worn
- c. Acquire bag valve mask with a high-efficiency particulate air (HEPA) and eliminate direct mouth to mouth resuscitation if possible.
 1. If using procket masks Ventilatory, they should have HEPA filtration in the exhalation path per manufacturer recommendations

Ensure adequate supply and reliable source for facemasks, eye protection and gloves.

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vii. CLEANING AND MAINTENANCE.

- a. Continue routine pool maintenance
- b. For indoor pools establish HVAC cleaning protocol
- c. If a person suspected/confirmed to have COVID-19 has been in the facility, follow CDC guidelines for cleaning and disinfection
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html#Cleaning>
- d. Establish a routine cleaning schedule
 1. before opening for the day,
 2. between shifts,
 3. when closing for the day
 4. address frequently touched surfaces
 - a. Ladders and handrails
 - b. Diving, slide and other equipment
 - c. Pool toys, kickboards, exercise equipment
(e.g. noodles, dumbbells, swim fins, goggles etc.
 - d. Light switches
 - e. Doorknobs and handles (interior and exterior),
 - f. Deck furniture (or consider requiring patrons to bring their own)
 - g. Drinking fountains, exercise equipment, emergency phones
 - h. Toilets, faucets, sinks, etc.
 - i. Touch pads
 - j. Keyless readers
 5. Follow CDC Guidance
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>
Excerpts as follows:
Hard (Non-porous) Surfaces
 - Surfaces should be cleaned using a detergent or soap and water PRIOR to disinfection.
 - For disinfection, most common EPA-registered household disinfectants should be effective.
 - Follow the manufacturer's instructions for all cleaning and disinfection products for concentration, application method and contact time, etc.
 - Additionally, diluted household bleach solutions (at least 1000ppm sodium hypochlorite) can be used if appropriate for the surface. Follow manufacturer's instructions for application, ensuring a contact time of at least 1 minute, and allowing proper ventilation during and after application. Check to ensure the product is not past its expiration date. Never mix household

If a Person
Suspected/
Confirmed to Have
COVID-19 Has Been
in the Facility, follow
CDC guidelines
for Cleaning and
Disinfection

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bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.

- Prepare a bleach solution by mixing:
- 5 tablespoons (1/3 cup) bleach per gallon of water or
- 4 teaspoons bleach per quart of water

Soft (Porous) Surfaces

- For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:
 - If the items can be laundered, launder items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and then dry items completely.
 - + Otherwise, use products that are EPA-approved for use against the virus that causes COVID-19 and that are suitable for porous surfaces
6. A list of EPA-registered disinfectants can be found at List N: Disinfectants for Use against SARS-CoV-2 (<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>)
- a. Hard surfaces
 - b. Soft surfaces
 - c. Personal Protective Equipment
 - d. HVAC equipment
- *All cleaning must be done in accordance with surface and cleaning product manufacturer instructions. Do not allow deck and furniture cleaning products to enter pool water.

viii. CHILDREN

- a. Require that children be accompanied by a guardian, even where Lifeguards are present
- b. Require that small children and non-swimmers be accompanied by a guardian in the pool
- c. Evaluate impact on swimming lessons and other activities, using USSSA COVID-19 ACTION PLAN (www.phtacoronaupdate.com/PHTACORONAUPDATE/assets/File/USS053_CovidActionPlan_R1.pdf)
- d. Swimming lessons must comply with state and local limits on gatherings
- e. Require parent to remain in water for lessons given to small children and other beginners
- f. Reduce number of pupils in swim classes
- g. Maintain spacing lap pools, considering width of lanes and possibly alternate lanes

For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces.

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ix. COMPETITIVE SWIMMING

- a. Meets and most swim team practices will likely violate limits on gathering and/or capacity
- b. Look for additional guidance from CDC, USSSA (https://www.usaswimming.org/docs/default-source/coaching-resourcesdocuments/covid-19-team-resources/facility-reopening-plan-guidelines.pdf?sfvrsn=8a533a32_2) and state and local athletic organizations.

x. GUEST HYGIENE

- a. Ensure adequate handwashing facilities and hand sanitizers
 1. Locate hand washing stations or hand sanitizer dispensers near entrances and exits, at waiting areas
- b. Signage reminding guests to wash hands
- c. Provide adequate hand soap, papertowels and trash receptacles to encourage handwashing

xi. EMERGENCY ACTION PLAN

- a. Evaluate COVID-19 impact on rescue protocol
 1. In water incidents
 2. on land incidents
 3. Use of Personal Protection Equipment by staff
 4. Revise CPR protocol re contact with victim
 5. Staff should treat any victim as COVID-19 positive until otherwise determined

xii. FOOD SERVICE

- a. If food service will be provided determine
 1. Products permitted
 2. where food may be eaten
 3. Preparation and packaging of products
 4. Social distancing of patrons in all food service areas
 5. See <https://www.fda.gov/food/food-safety-during-emergencies/best-practices-retail-food-stores-restaurants-and-food-pick-updelivery-services-during-COVID-19-19#employeehygiene> (Additional FDA is anticipated in early May.)

Ensure adequate handwashing facilities and hand sanitizers.

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xiii. LOCKER ROOMS:

- a. Restrict number of people in locker rooms and rest rooms
 1. Do not allow guests to congregate in waiting for access. The process can include floor markings, outdoor distancing, waiting in cars, etc.
 2. Consider an exit from the facility separate from the entrance.
 3. Determine ingress/egress to and from restrooms to establish.

xiv. MEMBER/GUEST COMMUNICATION

- a. Consider direct messaging to members, public notices for pools open to general public
 1. When you will open
 2. Hours of operation
 3. Capacity limits and scheduling of time slots/activities
 4. Mandatory distancing while using facility
 5. Symptoms of COVID-19 which will prohibit access
 6. Explain your disinfection protocol and member/guest responsibilities

xv. OTHER

- a. Do not permit swimming while wearing cloth or paper masks
- b. If diving, slide or play equipment is used, consider marking off proper distance for people in line
- c. During lap swim consider proper distance between swimmers
- d. Stagger lap swims, practices and lessons at opposite ends or corners of the pool(s)

E. Consult a pool safety professional and legal counsel with any questions

F. Prepare for inspection

- i. Make sure all utilities and services are activated
- ii. Be “inspection ready” and schedule inspection when able
 1. NOTE Some AHJs may have limited capacity

G. Prepare your staff and community for anticipated opening and new operating procedures

- Train all staff with regard to Order and Compliance Program
- Empower staff to enforce rules, and let them know you will support their actions
- Make sure senior personnel is present to support staff in any confrontation
- Notify members/patrons of compliance plan and restrictions in advance, and of the need to cooperate

Consider direct messaging to members, public notices for pools open to general public.

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ONCE OPEN:

- A.** Continue to maintain water and air quality
- B.** Maintain cleaning schedule on all contact surfaces as indicated in section 3.
 - i. Do not mix chemicals or cleaning products
 - ii. Follow all manufacturer instructions
 - iii. Keep deck and surface cleaning products out of pool water or perimeter overflow systems
- C.** Ensure staff is provided with and uses proper PPE
- D.** Maintain rescue and personal protective equipment and replace as needed
- E.** Inspect and maintain sanitization stations and equipment
- F.** Closely monitor air circulation
- G.** Stay connected to PHTA and CDC for further guidance and best practice tips
- H.** For indoor facilities, periodic cleaning of HVAC equipment
- I.** Continue to monitor and evaluate adherence to Order(s) and Compliance Plan
 - i. Regular review of surveillance
 - ii. Regular conversations with staff while maintaining proper distancing
- J.** Upon learning that persons suspected or confirmed to have COVID have been on premises, follow CDC guidelines for Cleaning and Disinfection <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html#Cleaning>
- K.** Keep accurate records on compliance
 - i. Cleaning schedule
 - ii. Number of patrons entering

Ensure staff is provided with and uses proper PPE.

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Additional information about COVID-19

For additional information about COVID-19 visit:
<https://www.phtacoronaupdate.com/>

PHTA understands the CDC is working on guidance that will focus on providing recommendations and other best practices related to reopening aquatic facilities. The CDC most likely will not provide a formal position on whether public aquatic facilities should reopen, as they currently state the following:

- Everyone should follow local and state guidance that may determine when and how recreational water facilities may operate.
- Individuals should continue to protect themselves and others at recreational water venues both in and out of the water – for example, by practicing social distancing and good hand hygiene.
- In addition to ensuring water safety and quality, owners and operators of community pools, hot tubs, spas, and water play areas should follow the interim guidance for businesses and employers for cleaning and disinfecting their community facilities.

When CDC re-opening guidance is available, we will update this document accordingly.

Everyone should follow local and state guidance that may determine when and how recreational water facilities may operate.

We want to thank all of the individuals and organizations that assisted PHTA with this document, including the American Red Cross, the Centers for Disease Control and Prevention, Life Time Fitness, local and state health departments, pool management companies, public health consultants, the World Waterpark Association and the YMCA.

Remember to always...

WASH HANDS WITH WATER AND SOAP/SANITIZER, AT LEAST 20 SECONDS

AVOID CONTACT WITH SICK PEOPLE

DON'T TOUCH EYES, NOSE OR MOUTH WITH UNWASHED HANDS

WEAR A MASK

AVOID CROWDED PLACES

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