



Environmental Public Health Division
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COVID-19 Response Recommendations for Pools and Aquatic Facilities

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In accordance with Governor Holcomb's "Back on Track Indiana" plan for stage 5 and Executive Order 20-43, public/semi-public pools, spas, water parks, and similar aquatic venues may operate without special bather load reductions as long as six (6) feet of social distancing can be maintained between persons of different households. While face coverings cannot be worn in the water due to the drowning hazard they pose, all non-exempt persons over seven (7) years of age must comply with Governor Holcomb's face covering requirement while on the deck or otherwise out of the water. Children two (2) years of age through seven (7) are strongly encouraged to wear face coverings while out of the water. Utilizing face coverings to the greatest extent possible is especially important at indoor venues where aerosolized respiratory droplets are more likely to persist and spread. Please realize that local orders may be more restrictive, so pool owners/operators are advised to check with local health departments for other expectations and requirements.

There is no evidence that COVID-19 can be spread through pool water itself within *properly maintained* aquatic venues, according to the Centers for Disease Control and Prevention (CDC). The disinfectant (Chlorine or Bromine) should readily kill or inactivate the virus that causes COVID-19 as long as water chemistry and water circulation are adequate. It is of course necessary that disinfectant levels and related water chemistry be maintained in accordance with 410 IAC 6-2.1 to provide this degree of protection.

However, there are **many** opportunities for COVID-19 to spread directly between patrons in the deck area, pool enclosure, and sanitary facilities. Frequently touched surfaces allow for the transfer of infected respiratory droplets. The direct spread of respiratory droplets through the air is also possible, though the risk is greatest within six (6) feet or less. Wearing cloth face coverings whenever possible will significantly reduce this risk. Maximizing the use of face coverings is especially important at indoor venues. Adequately separating persons not from the same household by six (6) feet or more is also able to reduce the likelihood of transmission. Furnishings within the deck area and pool enclosure will need to be properly spaced. Some will likely need to be removed. Frequently touched surfaces will also need to be disinfected often using an effective disinfectant.

Also note that the 500 person cap referenced in Executive Order 20-43 and Governor Holcomb's "Back on Track" plan is in reference to seasonal or special events. This is not applicable to the *normal* operation of a permanent aquatic venue. Local health officials should be consulted if a special event or gathering is being considered/planned at an aquatic venue that may exceed 500 total persons.

Face coverings

All non-exempt persons over seven (7) years of age must wear a face covering while not in the water. This includes all non-exempt staff and lifeguards. It also includes all persons on the deck, in the sanitary facilities, or otherwise within the building. Specific exemptions are listed in EO 20-43(3)(d). Children two (2) years of age to seven (7) should be encouraged to wear face coverings as much as possible while not in the water, as long as this does not pose a safety hazard for the children. Children under two (2) should never be expected to wear one due to the general risk of suffocation. Maximizing the use of face coverings is especially important within indoor aquatic venues, where respiratory droplets are most likely to persist and spread, potentially beyond six (6) feet.

Face coverings should not be worn in the water by any persons. Face coverings that unexpectedly become saturated with water could cause panic and lead to a drowning, especially in young children. Persons in the water are specifically exempted from having to wear face coverings in EO 20-43(3)(d)(xv) *as long as social distancing can be maintained*.

Because face coverings should never be worn in the water for these safety reasons, it is especially important that people in the water maintain six (6) feet of social distancing from other patrons who do not live in the same household. If one cannot maintain this six (6) feet of social distancing in the water, they must exit the water. Although specific bather load reductions have not been specified in Executive Order 20-43, venue owners/managers should take action to reduce the number of persons within the water if conditions become too crowded to allow for social distancing.

Lifeguards who cannot effectively perform their surveillance duties while wearing a face covering should be transferred to other duties and replaced by lifeguards who can. Lifeguard with glasses that frequently fog, as well as lifeguards who feel particularly anxious/distracted by having to wear a mask must not be assigned to life-saving patron surveillance duty.

Consideration must be given to the type of cloth face coverings worn by lifeguards; it must be possible to remove them very quickly before entering the water.

Under no circumstances should lifeguards be taxed with additional surveillance/enforcement duties related to enforcing face covering expectations. Other staff must be given those responsibilities.

Six (6) feet Social Distancing

The virus that causes COVID-19 is understood to spread from person to person through small respiratory droplets. Simply maintaining at least six (6) feet of space between people who do not live in the same household has been shown to significantly reduce the likelihood of Covid-19 transmission.

The facility owner/operator should implement all reasonable measures to promote, enable, and encourage social distancing between patrons from different households. This will require adequately spacing deck furniture and likely removing some fraction of the facility's deck furniture to accommodate such spacing.

The normally acceptable ‘bather load’ as calculated from the table in 410 IAC 6-2.1-7.5 may not be adequate to promote a 6’ minimum spacing between patrons on the pool deck. During stage 5 of Governor Holcomb’s “Back on Track” plan, there are no longer specific percentage reductions of acceptable capacity. Common sense and good judgement must be exercised. It is not mandatory to post a reduced bather load, however measures should be implemented to encourage and allow for proper six (6) foot social distancing.

Under no circumstances should lifeguards actively performing patron surveillance duty be required to enforce social distancing expectations, because this could distract them from their life-saving surveillance duties.

It may make sense to utilize guards who cannot adequately perform patron surveillance duty while wearing face coverings to promote and/or enforce Covid-19 related countermeasures, such as social distancing.

Disinfecting Frequently Touched Surfaces

The virus that causes COVID-19 can survive on surfaces *outside* of the pool water for days without regular disinfection. Patrons may become infected by touching contaminated surfaces and then touching their own mouth, nose, or eyes. This presents one of the most preventable means of COVID-19 transmission at pool and spa facilities.

Frequently touched objects such as those listed below are of particular concern and should be disinfected the most frequently.

- Door knobs/handles (in the venue as well as in any building entryway doors)
- Stair railings and pool ladders
- Tables, deck chairs, and benches
- Light switches, keyless entry readers, lock boxes
- Baby changing stations
- Drinking fountains
- Vending machines
- Telephones
- Any emergency shut off controls (typically found on spas)
- Restroom faucets, sinks, soap and paper towel dispensers, toilet flush controls, and doors
- Touch to activate controls on interactive fountains and spa therapy jets
- Pool decks and the splash decks of interactive fountains

An EPA registered disinfectant should be applied to such surfaces *after* removing any soil/dirt/grease/buildup in accordance with product label directions. It is important that soil/dirt be removed first for the disinfectant product to kill viruses effectively.

The Centers for Disease Control (CDC) has provided information and instructions on *how* to disinfect similar surfaces at the following: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html>.

A complete list of EPA registered disinfectants suitable for coronavirus surface disinfection can be found at the following: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

Household bleach (approximately 6% active Sodium Hypochlorite) can also be diluted by mixing 1/3 cup with 1 gallon of water. Liquid pool Chlorine is more concentrated (usually 10-12% Sodium Hypochlorite) and can be diluted by mixing 1/3 cup with 2 gallons of water. Bleach solutions should be mixed daily for use and discarded at the end of the workday. It is unnecessary and unsafe to use a dilution that is more concentrated. Chlorinated pool water is NOT adequate to serve as a surface disinfectant solution.

Appropriate personal protective equipment, such as chemical impermeable gloves, goggles, and/or a face shield should be utilized when working with all disinfectants in strict accordance with label directions and OSHA workplace standards.

Dependent on the type of disinfectant used (see label requirements), it may be necessary to disinfect some surfaces, such as the pool deck, when patrons are not present.

Consider implementing a system to gather and disinfect all deck chairs, kickboards, floats, etc. These items could then be signed out to incoming patrons for individual use. If it is not feasible to disinfect some items such as deck chairs between patrons (either due to time/staff constraints, or because the items physically cannot be disinfected given materials and construction), it would be advisable to take such items out of use. Patrons could potentially be permitted to bring items such as lawn chairs from home, or do without.

Balls and any toys/games normally used for communal play (volleyball, water basketball, etc.) should be taken out of use.

Water Chemistry

It is critically important that minimum disinfectant levels (Chlorine or Bromine), a proper pH, and Cyanuric acid (Chlorine stabilizer) levels that do not exceed Indiana regulatory limits be maintained. This will allow for the rapid inactivation of viruses such as the one that causes COVID-19.

With adequate water circulation, proper water chemistry, regular water chemistry testing, and the continuous feed of an EPA registered disinfectant (Chlorine or Bromine product), the pool/spa water itself can avoid becoming a mode of transmission for the coronavirus. Specific chemical parameters that are the most important for preventing the spread of viruses follows:

- Disinfectant level that meets the minimum level in 410 IAC 6-2.1-30(b). Depending on the type of pool and its relative risk, this level will be either 1, 2, or 3ppm.
- A pH level within 7.2-7.8 is required. pH levels above 7.8 reduce Chlorine's effectiveness.
- No Cyanuric acid, CYA, Chlorine Stabilizer, 'Trichlor', 'Dichlor', chlorinated isocyanurates, trichloro-s-triazinetriene, or dichloro-s-triazinetriene should be utilized in any pool, spa, or other aquatic venue that is indoors. IF such compounds are used in an *outdoor* venue, the

Cyanuric acid level must be tested weekly and maintained not to exceed 60ppm. Excess Cyanuric acid greatly reduces the disinfectant's effectiveness.

A more complete list of water chemistry regulations and testing requirements can be found within section 30 of the Indiana State Department of Health's *"Public and Semi-Public Swimming Pools Rule"* 410 IAC 6-2.1 at: https://www.in.gov/isdh/files/410_iac_6_2_1.pdf .

As required by the above Indiana State Department of Health regulation, any aquatic venue with a disinfectant level outside of the acceptable range, a Cyanuric acid level that is too high, a pH level above 8.0, or a chemical feeder or circulation pump that is not working should be immediately closed by the facility owner/operator until the problem is corrected.

Signage, handouts, and/or waivers

Specific COVID-19 relevant warnings could be presented to patrons in the form of signs, handouts, verbal instructions, or possibly even as a component of a waiver. Recommended statements that may be included in such a sign, handout, or waiver include, but are not limited to, the following:

- DO NOT enter this facility if you have a cough, fever, or other symptoms of illness.
- Maintain at least six (6) feet between you and any other people who are not part of your immediate household.
- Wear a face covering when you are not actively swimming or in the pool/spa water.
- NEVER wear a face covering while actively swimming, or allow children to do so.
- NEVER dive or enter a water slide with a face covering in place.
- The danger of contracting COVID-19 exists if you choose to enter this aquatic facility.
- You are responsible for washing your hands as well as any object/s you bring into this facility.

Additional Resources and Information

For more information on preventing the spread of COVID-19 at public/semi-public aquatic facilities, please visit:

- The Center for Disease Control's Coronavirus Webpage:
<https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- Pool and Hot Tub Alliance (PHTA)'s COVID-19 webpage:
<https://www.phta.org/corona-test#1>
- Indiana State Department of Health's Public Swimming Pool and Spa Program:
www.pools.isdh.in.gov
- Governor Holcomb's "Back on Track Indiana" plan website:
<https://www.backontrack.in.gov/>