

**\*\*DRAFT\*\***

## **EGLE Guidance to Opening Public Swimming Pools**

In addition to the CDC and State of Washington Guidance, EGLE offers the following supplemental technical information:

- Increase the minimum level of disinfectant residual, either following the State of Washington guidance or even slightly higher (preferably not more than 5 ppm but less than 10 ppm). Michigan's Public Swimming Pool Rules indicate a minimum level of disinfectant residual to be maintained at 1-2 ppm chlorine or 2-4 ppm chlorinated cyanurate based on pH or 2 ppm bromine.
- Proper operation with emphasis on proper flow rates to assure adequate turnover times must be assured. The CDC indicates with proper operation, maintenance, and disinfectant of pools, hot tubs or spas, and water playgrounds, the virus that causes COVID-19 should be inactivated. The recommended increase in residual levels of disinfectant would assure that residual depletion does not occur through bather use or UV degradation.
- Reduction in bather load correlating to the size of the facility to adhere to effective social distancing measures to reduce contact. A minimum of 50% of calculated bather load is recommended.
- Hot Tubs/spas should remain closed longer than typical pools. There is concern with opening spas/hot tubs due to the smaller footprint and inability to social distance. A possible option would be to limit the hot tub/spa to a corresponding bather load that provides for appropriate distancing.
- Water parks, splash pads, and other large venues, should remain closed longer than typical pools, with detailed procedures to assure distancing at a later time. They naturally attract crowds and have many high touch surfaces. Venues such as this could also be addressed through state or federal guidance on mass gatherings or places of public accommodation.
- "Flow through" splash pads do not have disinfectant and should remain closed longer than typical pools. Because they do not recirculate water or have filtration or disinfectant, they are not regulated by EGLE; therefore, it is unknown how many exist throughout the state. Communication that there is no residual disinfectant should be conveyed by these facilities to the public for those splash pads that are not licensed by EGLE.

EGLE offers the following additional information on public pools:

- Food/beverage should be limited if not eliminated to prevent another avenue for the spread of viruses.
- EGLE is aware that many organizations that certify lifeguards have extended the renewal or provided an online course to extend the certifications. EGLE will follow the requirements/guidance of these organizations for the extensions.

- Lifeguards will need to be supplied with proper PPE to be stationed within the pool enclosure should they need to perform life saving measures. Additional training may be necessary to assure their personal safety in addition to the safety of others.
- Proper maintenance of HVAC/dehumidification systems is very important for pool enclosures in general, but now even more important. Facilities will need to make sure their systems are properly functioning and maintained. If the pool enclosure has windows that can open, it is recommended that these are periodically opened to provide fresh air to the pool enclosure.
- Increased cleaning of surfaces will be required. This includes ladders, handrails, deck furniture, drinking fountains, bathrooms, showers, all touch point surfaces, etc. Also, since pool facilities have limited access through only 1 or 2 entrances, bather traffic is confined to those areas and will require increased cleaning. This might warrant tracking cleaning frequency on a supplemental form, since the monthly operating report (MOR) has limited space for noting cleaning.
- It will be important for facilities to assure MOR's are completed as required and for LHD's to review to assure they are correctly completed and submitted as required. This will include the bacteriological monitoring of at least quarterly.
- For pools that have little to no oversight, such as those in hotels or at apartments/condominiums, an increase in oversight may be necessary. This may include periodic checks of the pool enclosure. In addition, a sign-in process may need to be implemented to track users. This would be beneficial to identify occupants to facilitate contact tracing should a positive COVID-19 case be identified.
- EGLE and LHD's do not regulate personal, residential pools and spas.
- While EGLE recommends public pools/spas remain closed initially, it is important that both private and public pools be maintained and serviced to protect health and safety. Standing water and unmonitored, unattended pools can create a mosquito breeding area and a potential drowning hazard.