



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

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In accordance with Governor Holcomb's most recent Covid-19 related Executive Orders (available at [www.in.gov/gov/newsroom/executive-orders/](http://www.in.gov/gov/newsroom/executive-orders/)), public/semi-public pools, spas, water parks, and similar aquatic venues may operate without special bather load reductions provided that six (6) feet of social distancing can be maintained between persons of different households, compliance with the Governor's face covering mandate is enforced, and other public health countermeasures (described further below) are implemented.

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 if water chemistry and water circulation are adequate. It is necessary that disinfectant levels and related water chemistry be maintained in accordance with Indiana Department of Health Rule 410 IAC 6-2.1 to provide this protection.

However, there are *many* opportunities for COVID-19 to spread directly between patrons in the pool 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 much greater when people are less than six (6) feet apart. Maximizing the use of face coverings is especially important at indoor venues, where aerosolized respiratory droplets are most likely to spread further than six (6) feet. The CDC also recommends increasing the amount of outdoor makeup air being brought into an indoor venue as a countermeasure. Adequately separating persons not from the same household by six (6) feet or more is critical, especially given that face coverings cannot be worn by every individual within the enclosure. 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 need to be disinfected often.

Special consideration must be given to safety regarding face covering use in or around the water. Face coverings cannot be worn in the water due to the drowning hazard they pose. One is potentially unable to breathe once a face covering becomes saturated. This could induce panic, especially in children. There is also concern that young children aged two (2) to seven (7) could accidentally enter the water wearing a face covering, panic, and drown.

Both "social gatherings" and special "events" are addressed in Governor Holcomb's most recent Executive Order on a county-based, color-coded system to identify counties by their relative risks. A specific cap on the gathering/event size is established based on the color-coded risk assigned to a given county. These caps are not applicable to the regular operation of an established aquatic venue. Local health officials should be consulted if a special event or social gathering is being considered/planned.

## Face coverings

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 the executive order *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 or greater of social distancing from other patrons who do not live in the same household. If one cannot maintain six (6) feet of social distancing in the water, they must exit the water. Although specific bather load reductions have not been specified in the Governor's order, 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.

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.

**Indoor aquatic venues:** 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. 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 includes all persons on the deck, in the sanitary facilities, or otherwise within the indoor facility. Specific exemptions are listed in the executive order.

Children two (2) years of age to seven (7) may be permitted to wear face coverings at their parent/guardian's discretion while not in the water. However, there is concern that a young child could accidentally fall into the water, panic, and potentially drown after the face covering becomes saturated. Children under two (2) should never be expected to wear a face covering due to the general risk of suffocation.

Lifeguards must wear face coverings within an indoor aquatic facility with one exception. Although it is recommended that they always wear face coverings, they *may* remove their face covering after they have positioned themselves on the lifeguard platform as long as a 6' distance can be maintained from the platform chair. The perimeter around the lifeguard platform should be marked in some way to exclude patrons. The decision to allow this should ultimately be left to the facility owner/manager.

The lifeguards must use face coverings at all other times while working within an indoor facility. If required, lifeguards within indoor aquatic venues who cannot effectively perform their surveillance duties while wearing a face covering should be transferred to other duties and replaced.

**Outdoor aquatic venues:** Within an outdoor aquatic venue, face coverings *may* be utilized or even required while on the pool deck, although compliance with Governor Holcomb's order could also be achieved outdoors by patrons from different households maintaining at least six (6) feet of social distancing from one another. The decision of whether face coverings are mandatory for patrons on an outdoor deck should be made by the local health department, dependent upon the likelihood of effective social distancing at the specific facility. Their use should certainly be encouraged. Face coverings must be worn in restrooms, staff break rooms, and other indoor portions of the facility. It is strongly encouraged that all staff continue to wear face coverings with the one exception of lifeguards seated upon lifeguard platforms.

Lifeguards on duty at *outdoor* aquatic venues may remove their face covering once they have positioned themselves upon the lifeguard platform as long as a 6' distance can be maintained from the platform chair. This perimeter should be marked in some way to exclude patrons. The lifeguards must use face coverings when they are likely to come into close proximity with other people, as well as in break areas, restrooms, and other indoor portions.

### **Six (6) feet Social Distancing**

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. Staff must be instructed to socially distance.

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. Common sense and good judgement must be exercised. It is not mandatory to post a reduced bather load, however reasonable 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.**

### **Increasing Airflow from Outside**

The virus that causes Covid-19 can spread through tiny aerosolized respiratory droplets that move through the air of an indoor facility. Especially when athletic activity is occurring, these droplets have proven to spread further than six (6) feet. It is not safe to wear a face covering in the water, and young children under eight (8) cannot be expected to wear face coverings around the water as previously discussed.

For these reasons, the CDC recommends that facility owners/operators increase outdoor airflow into an indoor aquatic venue. Adjustments within HVAC systems can be made to increase the amount of outdoor makeup air brought into the indoor facility. It may also be possible to simply open windows to bring in more outdoor air at some facilities. The Indiana Department of Health (IDOH) recommends consulting with the facility's HVAC specialist before making changes.

## Disinfecting Frequently Touched Surfaces

The virus that causes COVID-19 can survive on surfaces *outside* of the pool water for days or possibly even weeks without disinfection. The virus survives the longest on smooth, non-porous surfaces at moderate temperatures with no UV light. While it is possible to contract the virus from surfaces, this is not one of the most common means of transmission; however, it is one of the most preventable pathways of exposure. Patrons *could* become infected by touching contaminated surfaces and then touching their own mouth, nose, or eyes.

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
- Goggles, kickboards, tubes, and similar items used within the water

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 Department of Health's "Public and Semi-Public Swimming Pools Rule" 410 IAC 6-2.1 at: [www.in.gov/isdh/files/410\\_iac\\_6\\_2\\_1.pdf](http://www.in.gov/isdh/files/410_iac_6_2_1.pdf) .

As required by the above Indiana 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>
- CDC Guidance for Pools and Interactive Water Fountains During COVID-19:  
<https://www.cdc.gov/coronavirus/2019-ncov/community/parks-rec/aquatic-venues.html>
- Indiana Department of Health's Public Swimming Pool and Spa Program:  
[www.pools.isdh.in.gov](http://www.pools.isdh.in.gov)
- Governor Holcomb's "Back on Track Indiana" website:  
<https://www.backontrack.in.gov/>