

# SYNOPSIS OF MAJOR CHANGES

## AQUATIC HEALTH ORDINANCE REVISION

	<u>Initial Proposed Regulations</u>	<u>Changes</u>	<u>Rationale for Change</u>
1	Deregulation of Health Clubs	No change from initial proposed change.	N/A
2	Spa pools and interactive water feature facilities must be under the supervision of someone with a pool operator license, but that person does not need to be on site.	Response time changed to 30 minutes.	Provides clear guidance to industry regarding AHD's expectation.
3	The Director will review and act upon a variance request within 20 days.	No change from initial proposed change.	N/A
4	Doggie swim allowed at conclusion of season (no humans may swim during or after doggie swim).	No change from initial proposed change.	N/A
5	Each separate body of water at an aquatic facility shall have a separate circulation, filtration, and disinfection system.	No change from initial proposed change.	N/A
6	The gap between ladders and the wall may not be more than 4 inches, and not less than 3 inches.	The gap between ladders and the wall may not be more than 6 inches and not less than 3 inches.	Industry feedback.
7	Section added to regulate bathing attire. Nude bathing prohibited.	Nude bathing prohibition removed.	Laws/requirements enforced by other agencies already address this issue.
8	Stricter egress requirements.	No change from initial proposed change.	N/A
9	Main drain outlet requirements were modified to comply with VGB.	Cover velocity changed so that code refers to cover manufacturer's specified flow rate.	Covers with higher velocities have been designed to prevent entrapment. Covers that are sold have been tested at the rated velocity to simulate entrapment conditions and have passed the testing methodology from ANSI.
10	Increased lighting requirements for indoor pools and outdoor pools that are open after dark.	No change from initial proposed change.	Many other jurisdictions have lighting requirements that exceed APSP's suggested requirements. Additionally, it will be helpful to industry for Alexandria to have the same requirement as surrounding jurisdictions.
11	Thermometer required in skimmer for heated main pools.	Requirement changed to allow placement of thermometer in an easily-accessible location.	Industry feedback; gutter pools will not have a skimmer in which to place the thermometer.
12	Exceptions for life line.	No change from initial proposed change.	N/A
13	Water fountain/water dispenser must provide cold water.	Requirement changed to add a numerical temperature requirement (<75F).	Industry asked for specific guidance.
14	Wading pool gate must be self-closing and self-latching.	No change from initial proposed change.	N/A

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15	Ventilation for indoor facilities.	No change from initial proposed change.	N/A
16	Authorized personnel only sign on filter room / chemical room doors.	No change from initial proposed change.	N/A
17	Bather load placards posted.	No change from initial proposed change.	Brings Alexandria code into conformance with other local jurisdictions (Fairfax & Arlington).
18	Blood borne pathogen kit	No change from initial proposed change.	N/A
19	CPR pocket mask.	Requirement changed to require all lifeguards to have a CPR pocket mask.	Alexandria Red Cross feedback.
20	Secondary containment for chemical storage.	No change from initial proposed change.	N/A
21	No diving signs.	Requirement changed to address specific size of the sign (5 inch letters).	5 inch lettering will be easy to see/read, and will be consistent with surrounding jurisdictions.
22	Water contamination placard/instructions.	Requirement changed so that a placard is not required; instructions must just be easily-accessible.	Requirements may change, which would require new placards. Additionally, it is not necessary to post these requirements. It is more important that the information is available on site.
23	Deck contamination instructions.	No change from initial proposed change.	N/A
24	Increased minimum chlorine residual for pools that are stabilized.	No change from initial proposed change.	In a worst-case situation, a pH of 7.8 would provide 30% hypochlorous acid (effective disinfectant) and 70% hypochlorite ions (not effective disinfectant). The addition of CYA would reduce the effectiveness of hypochlorous acid by 20% at 100ppm. Higher residual level will ensure adequate disinfection / oxidation.
25	Spa emergency pump shut off switch.	No change from initial proposed change.	Current proposed requirement states "immediately accessible from the spa pool deck." The interpretation of this requirement by AHD would not allow the switch behind a door.
26	Hard wired telephone for spa areas.	No change from initial proposed change.	N/A
27	Spa turnover rate of <15 min.	No change from initial proposed change. However, existing spa pools have been specifically grandfathered.	It was not our intention to require retrofitting of spa pools to achieve a higher flow rate. The grandfather clause makes this clear.
28	Extra set of cartridge filters.	No change from initial proposed change.	It is unreasonable to expect a lifeguard to clean cartridge filters after the pool closes.
29	TDS requirement changed to 1,500 ppm.	TDS requirement adjusted to 1,600ppm to account for start-up value of TDS in water supply.	Takes into account TDS already in the water when the pool is filled.
30	Waterpark facility construction requirements.	No change from initial proposed change.	N/A

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31	Interactive water feature facility requirements.	Definition changed.	New definition provides a little more clarity when determining whether something is an IWF.
32	Secondary disinfection device required for water features that aerosolize water.	No change from initial proposed change.	N/A
33	Maximum cyanuric acid level is 50 ppm	No change from initial proposed change.	Given a worst case scenario of 7.8 pH and 100ppm CYA, level of disinfectant (hypochlorous acid) is extremely low, increasing time required to inactivate bacteria/viruses and increasing time required to oxidize nitrogenous-based material. When CDC releases the MAHC, we will reevaluate this requirement. If additional science on the subject is released, we may choose to reevaluate the requirement at that time.
34	More detailed requirements regarding returns (number and placement).	No change from initial proposed change. However, existing facilities are specifically grandfathered.	It was not our intention to require existing facilities to retrofit the pool. A grandfather clause makes this clear.
35	Two light fixtures required in filter rooms.	No change from initial proposed change.	N/A
36	Facilities requiring more than one preoperational inspection will be required to pay a fee before the Health Department will conduct a reinspection.	A list has been created showing examples of items that would necessitate a reinspection.	Industry asked for guidance.
37	Ring buoy and throw rope not required.	No change from initial proposed change.	N/A
38	Diving board requirements are stricter (>3.0M board refers to FINA standards; 1.0m<Boards<3.0m have stricter requirements.	No change from initial proposed change.	N/A
39	Provision to exempt bed and breakfasts from code IF a sign is posted indicating that the pool or spa is not inspected by the Health Department.	No change from initial proposed change.	N/A
40	Provision to exempt pools or spas located where there is also a child care facility from code IF the pool or spa is locked or otherwise secured while the child care facility is in operation.	No change from initial proposed change.	N/A
41	Outdoor and indoor maximum chlorine level raised to 5 ppm.	No change from initial proposed change.	Some industry feedback proposed a level of 10ppm, with some changes at the bottom end of the range. We are comfortable with a level of 1ppm given there have not been crypto outbreaks associated with pools that have a level of 1ppm or more. Additionally, we feel 10ppm is too high given emerging research on asthma, and the APSP recommendation of 4ppm maximum.

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42	Class One civil violation for falsifying records or credentials (\$5000).	Requirement has been clarified. A civil penalty will be given to the pool management company. In the event that the facility is self-managed, the civil penalty will be given to the owner.	It is the pool management company's responsibility to assure that their employees have genuine credentials. CPOs act as the agent of the pool management company or pool owners, thus the CPOs employer is responsible for their actions.
43	Class Two civil violation for operating on a suspended permit; operating without a permit; operating without a management company permit (\$1000 for the first violation; \$2000 for the second violation).	No change from initial proposed change.	N/A
44	Class Four civil violation for other violations of the ordinance (\$100 for first ticket; \$250 for second ticket)	No change from initial proposed change.	N/A
45	Plan review fee for new facilities. Plan review fee for remodeling.	No change from initial proposed change.	Definitions are clear in differentiating between remodeling and repair.
46	Facilities required to post a sign stating that the pool is inspected by AHD; the sign shall provide contact info for AHD in the event of a complaint.	Requirement changed. This information will be provided on our permit, which is already required to be posted in a conspicuous location.	Reduction in the number of required signs.
47	Ratio of one lifeguard for 25 patrons in pool.	Modified to allow for different ratios at waterparks; significantly increased training and in-service requirements for waterpark lifeguards	Waterpark industry feedback.
48	10 minute break every hour and 30 minute break after 4 hours.	Requirement adjusted to incorporate "continuous" lifeguarding.	No need for a break if the lifeguard is at a pool that hasn't had any patrons all day.
49	Demonstration of skills (lifeguard and pool operator)	Guidance will be provided on the website giving sample questions/topics/etc.	Industry asked for guidance.
50	Each pool management company must register and pay a fee prior to operating swimming pools in the City.	No change from initial proposed change.	N/A
51	None	Added a thunder/lightning requirement. Pool facility shall close for 30 minutes in the event of lightning/thunder.	Proposed by industry. This standard is suggested by a number of organizations (National Association of Athletic Trainers, National Weather Service).