



March 16, 2023

Council for the Model Aquatic Health Code
20987 N. John Wayne Pkwy, Suite B104-125
Maricopa, AZ 85139

Ms. Reister:

CDC thanks the Council for the Model Aquatic Health Code (CMAHC) for the 2023 Model Aquatic Health Code (MAHC) update considerations based on CMAHC member voting and CMAHC Board recommendations that you sent on February 2, 2021. This type of detailed reading of and thinking about MAHC improvements reinforces our belief that the CDC/CMAHC partnership will continue to optimize the MAHC as a tool that helps ensure healthy and safe swimming for everyone at U.S. public aquatic facilities.

Of the 322 change requests (CRs) that the CMAHC Board of Directors recommended be accepted by CDC for incorporation into the fourth edition of the MAHC, CDC approved 299 (92.8%) of them. CDC accepted two additional CRs that the CMAHC Technical Review Committee and members voted to pass, but that the CMAHC Board did not recommended for inclusion. These change requests and the rationale for CDC's decisions are outlined below.

- **CR 3.1-0001:** Delete IPC abbreviation.
- **CR 3.1-0002:** Delete ISPSC abbreviation.
- **CR 3.1-0003:** Delete IAPMO abbreviation.

Rationale: Did not delete these abbreviations, because CDC synced glossary of abbreviations content in MAHC Code and Annex.

- **CR 3.2-0026:** Replace “the general public is exposed to water” with “a person is or people are exposed to water” from *Aquatic Venue* definition.

Rationale: Did not replace text to prevent the MAHC from applying to aquatic venues not open to the public.

- **CR 3.2-0038:** Delete “a sign with the words ‘No Diving’” from *No Diving Marker* definition.

Rationale: Did not delete text to be consistent with decision on CR 4.5.19.4-0001 (see below).

- **CR 3.3-0001:** Delete IAPMO reference.
- **CR 3.3-0002:** Delete IPC reference.
- **CR 3.3-0003:** Delete ISPSC reference.
- **CR 3.3-0004:** Delete IAPMO reference.

Rationale: Did not delete these references, because CDC synced list of cited codes and laws content in MAHC Code and Annex.

- **CR 4.1.5.3-0002:** Delete text on issuing permit to operate.

Rationale: Did not delete text to be consistent with decisions not to pass CR 4.1.5.4-0001 (delete text on denial of permit to operate) or CR 4.1.5.5-0001 (delete text on documentation of renewal or denial of permit to operate).

- **CR 4.5.19.4-0001:** Delete words from “No Diving” markers.

Rationale: Did not delete the words “No Diving”, given risk of spinal cord injuries associated with diving into water depths 5 feet or less and severity of spinal cord injuries.

- **CR 4.6.2-0002:** Reorganize “Indoor Aquatic Facility Ventilation” section.

Rationale: Did not reorganize this section, because this CR included edits to the code text, and this CR was difficult to follow given some of the other CRs for this section passed and others did not.

- **CR 4.7.1.3.1.1.1-0001:** Delete text on alternative inlet designs being allowed with adequate engineering justification.

Rationale: Did not delete text to be consistent with decision to pass CR 4.7.1.3.1.1.1-0002 (make justification dependent on computational fluid dynamics model documenting no dead zones). Passing CR 4.7.1.3.1.1.1-0002 means keeping text deleted by passing CR 4.7.1.3.1.1.1-0001.

- **CR 4.7.3.3.3-0001:** Add text to locate interactive water play aquatic venue UV system after the feature pump to treat 100% of the water.

Rationale: Accepted added text to be consistent with decision to pass CR 4.7.3.3.2-0002 (add text to locate interactive water play aquatic venue secondary treatment system after the feature pump). CMAHC Technical Review Committee and members voted to pass CR 4.7.3.3.3-0001, but the CMAHC Board recommended CDC not accept it.

- **CR 4.8.2.2.4-0001:** Add text to design tall diving platforms to minimize injury risk.

Rationale: Did not add text because text needs further development to make it enforceable.

- **CR 4.8.6.2.2.3-0001:** Replace “permanent barrier” with “permanent enclosure”.

Rationale: Accepted replacement because “enclosure” is used for permanent access prevention. CMAHC Technical Review Committee and members voted to pass CR 4.8.6.2.2.3-0001, but the CMAHC Board recommended CDC not accept it.

- **CR 4.9.2.5.2.4-0001:** Delete text on monitoring exhaust system of interior chemical storage space with alarm sounding if differential air pressure not maintained for 30 minutes.

Rationale: Did not delete text to be consistent with decision not to pass CR 4.9.2.4.5.7-0001 (delete text on equipping door of interior chemical storage area with alarm if door open >30 minutes).

- **CR 4.11.3.1-0001:** Replace “whichever is greater” with “whichever is lesser” for air gap vertical distance being two diameters of water supply pipe or 6 inches.

Rationale: Did not replace text because of potentially different public health impacts depending on if water supply pipe is for aquatic venue with relatively small water volume (e.g., interactive water play aquatic venue) and aquatic venue with relatively larger water volume (e.g., surf venue or artificial swimming lagoon).

- **CR 4.12.2.2-0001:** Delete flume requirements.
- **CR 4.12.2.3-0001:** Delete flume exit requirements.
- **CR 4.12.2.4-0001:** Delete landing pool requirements.

- **CR 4.12.2.8-0001:** Delete slide runout requirements.
- **CR 4.12.2.9-0001:** Delete drop slide requirements.

Rationale: Did not delete text because it focused on prevention illness and injury and otherwise deferred to manufacturer's recommendation or ASTM International Standard 2376 for water slide systems.

- **CR 5.9.1.2-0001:** Delete text on chemical handling being compliant with U.S. Occupational Safety and Health Administration and Environmental Protection Agency regulations.

Rationale: Did not delete text to be consistent with decision not to pass CR 5.9.1.1-0001 (delete text on chemical storage being compliant with local building and fire codes).

- **CR 6.2.2.1-0001:** Delete text on quantity of lifeguard experience prior to attending lifeguard supervisor course.

Rationale: Did not delete text, because intent is for course attendees to have some lifeguarding experience (e.g., 100 hours).

We look forward to partnering with CMAHC on the fifth edition of MAHC to ensure it remains current with the latest science and technological advances in aquatics.

Sincerely,



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