

July 31, 2011
20 Azalea Place
Novato, CA 94949

Dave Walls, Executive Director
California Building Standards Commission
2525 Natomas Park Drive
Suite 130
Sacramento, CA 95833-2936

**Subject: Express Terms, CDPH Title 24, Chapter 31B, Public Pools,
7/15/2011**

Mr. Walls,

I have a second set of comments to make regarding the Express Terms, CDPH Title 24, Chapter 31B, Public Pools, 7/15/2011.

Please refer to the attached letter addressed to Waterworld, California dated July 31, 2011.

Section 3116B, Toilet, Shower and Dressing Facilities

Section 3116B2.2 Toilets states:

Separate toilet facilities shall be provided for each sex. One toilet shall be provided for every 60 women or less and one toilet plus one urinal for every 75 men or less.

For public pool facilities spread over a large area, such as "Water Parks," these requirements are not adequate. In my opinion, for public pool areas over a certain size, two or more sets (male and female) of toilet facilities must be required. I know that the California Department of Public Health could care less about urine in the public pool water since urine is not infectious. However, it is necessary to provide adequate access to restrooms to prevent human feces from contaminating the public pool water.

In addition, for Water Parks, the State of California should also require a certain number of "Family Restrooms." In Family Restrooms the parents can adequately supervise all of their children together.

Diaper Changing Facilities

In my previous comments, I stated that diaper-changing facilities must be required. Now that I have visited Waterworld, I realize that the requirements must be more specific. For Water Parks, which have a large number of guests, fold-down diaper changing tables in the restroom, within a toilet stall or outside of a stall, are not adequate. The infants and toddlers may be wet and slippery and will be more likely to fall onto the hard floor. Therefore, the diaper changing facilities must consist of permanent "counters," with a low wall to prevent the child from falling onto the floor. The diaper changing facilities must also be co-located with handwashing facilities.

Pool Users Who Wear Diapers

I also believe that if a child is not toilet trained, whether the child is wearing "swim diapers" or not, then the child should only use a shallow pool that is designated for small children. Exceptions can be made where there is only one swimming pool, such as at hotels or motels. Then when the children's pool is visibly contaminated with feces, it can be closed down and the remainder of the facility can remain open. Pool guests who are able to use the toilet should not share the water with children who cannot control their bowels / are not toilet trained.

Section 3117B Drinking Fountains

One guarded jet drinking fountain shall be provided within the pool enclosure for the first 250 pool users and an additional guarded jet drinking fountain shall be provided for each additional 200 pool users or less. The number of pool users shall be determined according to Section 3116B.2

In my opinion, for public pool facilities spread over a large area, such as "Water Parks," these requirements are not adequate. For such Water Parks, drinking fountains must also be required at certain travel distances within the park. With the currently-proposed requirements, there could be a bank of several drinking fountains in one location, and then the requirement would be met. In addition, I believe that all Water Parks must be required to allow guests to bring sealed plastic water bottles into the park. The public safety goal is to prevent the pool guests from drinking the pool or spray park water. And therefore, adequate sources of drinking water must be provided.

Thank you for your consideration.

Sincerely,



Catherine Rucker, EMT-1
B.S. Chemistry, UC Berkeley
A.S. Fire Technology, Santa Rosa Junior College
Cell 415-246-6647

Attachments:

C. Rucker letter to Waterworld in Concord dated 7/31/2011
Site Map for Waterworld in Concord, CA
Site Map for Raging Waters in San Jose, CA

Reference:

Express Terms, CDPH Title 24, Chapter 31B, Public Pools, 7/15/2011

Copies to:

Robin Belle Hook, REHS, Environmental Health Services Section Chief
Linda Mayo, California PTA VP of Health
California Spa & Pool Education Commission

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20 Azalea Place
Novato, CA 94949

COPY

Waterworld
1950 Waterworld Parkway
Concord, CA 94520-2602

To Whom It May Concern,

I visited Waterworld on Friday, July 29th and I have some comments to make regarding hygiene.

Restroom Facilities:

I am very concerned because there is only one set of restrooms. They are located at the entrance to the park, and the park covers a large area. If an individual needs to urinate and is not near the one set of restrooms, then that person will simply urinate in the public pool water. If an individual needs to defecate, then perhaps he or she will make the effort to use the toilet in the restroom near the entrance. I suggest that Waterworld add one or more restroom facilities at the far end of the park so that they will be conveniently located – to encourage the guests to relieve themselves in urinals / toilets only. Providing porta-potties at the far end of the park would be better than providing no additional restrooms. For example, Raging Waters in San Jose provides two sets of restrooms for its guests.

I don't want to be informed that Waterworld uses plenty of sanitizer / chlorine and that the water chemistry is tested throughout the day. I want to know how Waterworld is preventing guests from urinating in the public pool water in the first place.

Diaper Changing Facilities:

These rules are posted outside of the restrooms at Waterworld:

Changing diapers on or around the pool deck is not allowed. Diaper changing areas are provided in restrooms. Please wash hands with soap and water after changing a diaper.

Scenario: If a family is in the children's area, at "Wildwater Kingdom," and an infant / toddler needs a diaper change, and yet an older sibling is happily playing in the water; then the parent is not going to take the entire family to the restroom to change the diaper, and then return to the play area. Rather, the parent will simply change the diaper at the water play area. I suggest that Waterworld add a diaper changing facility; to include a handwashing sink, within the children's play area.

In addition, the diaper changing areas that are "provided in the restrooms" consist of plastic drop-down tables that are located in the handicapped stalls. And there is no signage on the doors to the handicapped stalls to indicate that diaper changing tables are inside. If I were the parent of a child in diapers, I would be very upset if I needed to change a diaper and I were forced to wait several minutes while another guest finished using the toilet in the handicapped stall. Instead, Waterworld should provide several diaper changing areas that are within the

open area of each restroom, near the handwashing sinks. The diaper changing counters should have a lip on the side, as to prevent the children from falling onto the cement floor.

In addition, children who are not toilet trained, and who are in diapers should only be allowed to play in the water at a designated "infant / toddler play area." Instead, they are allowed to be anywhere within the park, as long as there is no height requirement to prohibit entry. For example, they can be in the lazy river or in the wave pool. Why should my family share the water with someone who is not toilet trained? Swim diapers do not adequately prevent feces from entering the water.

Lack of Drinking Fountains:

These instructions are also posted outside of the restrooms:

Children should be told not to drink the pool water.

How about:

"Waterworld will provide adequate drinking fountains throughout the facility (and not only provide bottled water for sale at \$3 each) – to prevent children and adult guests from drinking the pool water."

At Raging Waters in San Jose "sealed plastic bottles of water are permitted." However, at Waterworld in Concord, "No outside food or drink may be brought into Waterworld California."

Conclusion:

It may be that Waterworld meets or exceeds all of the current California Department of Public Health Title 22 and Title 24 health and safety requirements. I am suggesting that Waterworld apply common sense to go above and beyond the minimum standards in order to truly protect the public's health and to create the best possible experience for its guests. Waterworld California claims to be the "best water park in Northern California." Waterworld may be the best in terms of attractions and guest safety. However, I am not so sure if Waterworld is the best in terms of truly adequate hygiene.

Catherine Rucker, EMT-1
Cell 415-246-6647

Copies to:

Contra Costa County, Office of Environmental Health

California Department of Public Health

Dave Walls, Executive Director, California Building Standards Commission, regarding proposed Title 24 Regulations

California Spa & Pool Education Council

