



July 5, 2011

Ms. Robin Belle Hook
Environmental Health Services
P. O. Box 997377, MS 7404
Sacramento, CA 95899-7377

RE: Proposed Title 22, Chapter 20: Public Pool Regulations

Dear Ms. Belle Hook:

I am writing today to encourage the California Department of Public Health to adopt the Operator Training module, the first module posted from the Model Aquatic Health Code (MAHC) into California's Code of Regulations, Title 22, Chapter 20: Public Pools: Section 65521: Pool Operator. The Model Aquatic Health Code is being created by the world's chief public health organization, the Centers for Disease Control and Prevention (CDC) and dozens of volunteers. This standard is the first public-domain, scientifically-based standard that is free for all jurisdictions. The Operator Training module includes the scientific justification to require that public pool operators in California receive basic training and earn a certification via an unbiased and proctored national exam. Studies cited in the MAHC reinforce the obvious: that minimum training helps operators prevent violations of health codes and safeguards the health of the public.

I am a Certified Instructor for the National Swimming Pool Foundation and have been teaching their CPO (Certified Pool & Spa Operator) certification course in southern California for over 3 years. I have trained over 500 students who work, or supervise the work, on pools in municipalities, hotels, resorts, water parks, HOAs, and other commercial and residential properties. In my classes, I have heard many stories which have startled and alarmed me concerning the severe lack of knowledge in basic water chemistry and fundamental pool maintenance of those operating swimming pools in California.

Pool cleaning and maintenance should never be a cavalier "splash and dash" to the beach operation. The truth is that any person from any walk of life may purchase basic pool equipment and chemicals, put a sign on their truck, and advertise themselves for hire as a pool operator/technician -- without any training or basic understanding of proper pool maintenance or water chemistry. **They learn their trade on the job at the expense of the general public.**

There are many dangers lurking in water in the form of viruses, bacteria, parasites and fungi that, if not properly treated, impose potential illness or death to bathers in those swimming pools. And yet, there is no requirement for training for pool operators/technicians. With millions of pools to maintain in the state of California, this is not only a travesty, but a very profound and potential life-threatening problem. **Personnel who are required to maintain and operate a public pool without verifiable training put the safety, health and even the lives of the public at risk.**



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Although every pool operator/technician can make a choice to obtain formal education on their own, there is, unfortunately, an overall resistance by the pool service industry to do so. This is, no doubt, a result of the ease with which one can enter this industry and with no ongoing accountability or educational mandates for licensing or certification. That is why, I believe, that the MAHC Operator Training Module specified in Title 22 can make a difference and help motivate the swimming pool service industry toward a higher educational and professional level, not only for the well-being of the general public but for the industry as a whole.

As an independent business professional in this field, as a NSPF Certified Instructor, and as a member of IPSSA (Independent Pool & Spa Service Association), I urge you to adopt the CDC's Model Aquatic Health Code's Operator Training Module into Title 22.

If you have any questions, please call me at (949) 235-5888.

Sincerely,

Steve Donohoe
President & CEO
Hupomone Services, DBA: Another Perfect Pool
California CSLB #873786

cc: Mr. Tom Lachocki, Chief Executive Officer
National Swimming Pool Foundation

cc: Bob Luedtke, President
Independent Pool & Spa Service Assoc.