Franci Tartaglino, owner, A Healing Trail Wellness Center
500 Burlington Road, Harwinton, CT 06791

in support of
HB 5101 - An Act Concerning Licensing Requirements For Certain Types Of Pools.

Thank you for allowing me to present information on why Epsom salt float therapy rooms should be exempt from the swimming pool standards.

An Epsom salt float treatment is provided in a 4'x8' room filled with 1,000 lbs. of Epsom salt dissolved in 10 inches of water. This is an engineered, pre-manufactured, self-contained unit that plugs into the wall and just sits on the floor. They are not even designed to be a permanent installation in the building. Some of the lesser brands look like coffins or pods. They are equipped with built-in UV sterilization as well as high capacity filters. The salt concentration is over 25%. A 10% salt solution would be considered a disinfectant agent. No other chemicals are needed, or appropriate, since it is a sealed unit.

I certainly understand the rules needed to keep public swimming pools safe and clean and the fee associated with examining all the engineered building plans, safety plans, water discharge plans and other documents during the planning and construction of an Olympic size pool. However, none of this applies to a salt therapy room.

The $950 application fee may be appropriate for an Olympic pool as it would be only a tiny fraction of 1% of the project cost. However, for these therapy rooms, the $950 fee **per unit** amounts to more than a 10% tax on plugging in a piece of medical equipment in our office. I started planning this purchase by contacting my local Torrington area health department. They were extremely helpful in analyzing of water usage and evaluating the capacity of our on-site septic system. For all their work, they only charged me $55 but told me I would also need a DPH permit. At the time, I thought no problem if DPH could be as easy and helpful as my local health department. When I ever saw that the DPH wanted an application fee of almost $2,000, my heart sank for this project! I've had my local permit for six months and I would really like to get started on this project! That DPH fee is high enough to discourage many small-scale health care providers from considering installing this piece of equipment. I'm sure that was not the intent of the good people who wrote the swimming pool regulations.

I have owned a Wellness Center in Harwinton, CT for 18 years. I am here to speak not only on behalf of my own facility but also for all my fellow health care practitioners in CT who will be adding these units in the near future. This type of salt therapy has dramatic health benefits and you can expect to see many more of them now that we have a high quality manufacturer right in upstate NY.

I have also brought the exemption language from several other state health departments in NC, IL, WI and AZ and the recommended standards from the US Floatation Tank Association.

15A NCAC 18A .2544 SPECIAL PURPOSE AND THERAPY POOLS

(a) Special purpose and therapy pools shall comply with the requirements for public swimming pools and spas except as specified in this Rule.

(b) Float tanks:

(1) The requirement in Rule .2522 of this Section for a deck or walkway continuous with the top of the pool wall does not apply to isolation float tanks where a clear floor space of at least eight feet by four feet is provided adjacent to the entrance to the tank.

(2) The requirement in Rule .2532 of this Section for the minimum ceiling height of 7 ½ feet above the rim of the pool does not preclude use of a canopy of a lower height to enclose an isolation float tank provided the canopy can be opened to allow users a standing entry and exit from the float tank.

(3) The minimum lighting requirement in Rule .2524 of this Section does not apply to float tanks provided lighting is available for cleaning and is sufficient to provide visibility for entry and exit from the float tank.

(4) The requirements in Rule .2518 of this Section that recirculation pumps operate 24 hours per day do not preclude turning off the pump during float sessions when a sanitizing cycle is provided that filters and disinfects the entire capacity of the float tank system at least twice before every user enters the pool. When the float tank is not being used, the pump shall either operate continuously or intermittently to filter and disinfect the capacity of the pool twice every hour.

(5) The requirement in Rule .2518 of this Section that pool pumps three horsepower or smaller meet NSF/ANSI Standard 50 is not applicable when the mineral content of the brine in a float tank is incompatible with standard pool pumps. Pumps that do not meet NSF/ANSI standard 50 shall be approved by the Department when the viscosity of the mineral solution in the float tank requires a pump impeller or magnetic coupling designed to pump viscous liquids. Electrical safety of such pumps shall be verified by an independent third-party testing lab to meet applicable Underwriters Laboratories (UL) Standards.

(6) The requirement in Rule .2532 of this Section for a caution sign at spas with a water temperature above 90 degrees Fahrenheit is not applicable to float tanks that do not exceed an operating temperature of 95 degrees Fahrenheit. Float tanks that exceed an operating temperature of 95 degrees Fahrenheit shall have a posted sign with the same warnings required for hot spas except references to spas may be reworded to reference float tanks or float spas.

(c) Swim Spas:

(1) Irrespective of Rule .2522(k) of this Section, swim spa training pools that use jetted water for training swimmer athletes under constant supervision of a swim coach may be located above deck level. Swim spa training pools located above deck level shall be in an enclosure secured against unauthorized access or use when a swim coach is not present.

(2) The maximum operational water depth of four feet required for spas in Rule .2532 of this Section does not apply to swim spas.

(3) Ladders, steps or stairs required by Rule .2521 of this Section are not required for an above-ground swim spa where a handhold or handrail is provided to facilitate transfer over the pool wall.

(d) Exercise Therapy and Treadmill Pools:

(1) The maximum operational water depth of four feet required for spas in Rule .2532 of this Section does not apply to exercise therapy and treadmill pools.

(2) The 30 minute turnover rate required for spa recirculation systems in Rule .2532 of this Section does not apply to exercise therapy or treadmill pools with a water capacity exceeding 1,000 gallons provided that the turnover time does not exceed two hours.

(e) Scuba Training Pools:

(1) The prohibition of underwater ledges in Rule .2516(b) of this Section does not preclude drop-off ledges to the deep-diving portion of pools designed and used for training swimmers to use self-contained underwater breathing apparatus.

(2) Scuba pools shall comply with the requirements for swimming pools and are not required to meet the requirements for spas in Rule .2532 of this Section.

History Note: *Authority G.S. 130A-282;*
Eff. April 1, 2013.

Floatation Tank Association - www.floatation.org - (530) 477-1319

Introduction to the US Float Tank Standard

Sanitation and Safety Committee:
Ashkahn Jahromi, Shoshana Leibner, Glenn Perry, Graham Talley, and David Wasserman

Float Tank (a.k.a. Floatation Tank, Float Room/Pod, Isolation Tank, or Sensory Deprivation Tank): A tank that contains a saturated solution of magnesium sulfate having a specific gravity of 1.23 to 1.3, provides a light and sound free environment, and is maintained at a temperature of approximately 93.5°F (34.1°C).

In states and counties that do not already have standards for float tanks, there is often an attempt initially to place them in the same category as pools or spas. Due to the unique nature of floating, this leaves out procedures important to float tank maintenance and enforces others that make no sense for the small, saline environment. This not only creates inaccuracies that are difficult for float centers to accommodate, it can lead to improper care of the tanks and even cause potential health hazards.

We have drawn up a document of Float Tank Standards which represent our recommendations for the minimum best practices to ensure quality, sanitation, and safety while operating float tanks in a commercial setting. The nature of the saline solution and the way in which floaters interact with the environment is not only different than a pool/spa, it is also naturally inhospitable to many of the dangers that a pool/spa has to deal with. In the 40 years that float tanks have been publicly available in the US, there have been no reported health outbreaks, injuries, or deaths relating to them.

Both in their inherent nature, and through their operating procedures, float tanks differ from pools and spas in three major ways:

Reduced Contaminants

Compared to a pool or spa, the way that users interact with the float tank results in significantly lower levels of contaminants being introduced into the solution in the first place:

- Users must shower before entering the float tank.
- About 50% of the user's body is out of the water at all time.
- Users float without a bathing suit, which usually harbors a good portion of the dirt and bacteria that enters a pool or spa.
- Floating requires no vigorous movement, and the water is kept at skin-temperature. This results in the user not producing any sweat.

High Salt Effect

The most significant difference between a float tank and a pool or spa is the fact that float tanks are filled not with water, but with a solution that is comprised of about 75% water and 25% Epsom salt. Salt is a natural sanitizer, and at this concentration, it is incredibly difficult for most of the common bacteria and contaminants, that most pool/spa regulations are written for, to survive.

This is known as the high salt effect. According to Dr. Oscar Pancorbo (Director of the Massachusetts Department of Environmental Protection Analytical Division and Station Chief of the Wall Experiment Station in Lawrence, MA), "No pathogenic organisms can survive salt concentrations above approximately 10 percent." With a solution of 25% salt, the float tank is above and beyond the level of pathogenic decomposition.

In addition, the naturally dark environment required of a float tank makes it difficult for the float tank to harbour any organisms that require light to live.

Rigorous Filtration

Continuous filtration is an ineffective means of sanitizing a float tank. In addition to this, the noise and current generated by a running pump during a user's float significantly disrupt the sensory deprivation that is fundamental to the purpose of a float tank.

Both the size of the tank and scheduling requirements for commercial float tanks result in very predictable user load. Because of this, levels of disinfectant can be maintained at appropriate levels at all times without the use of continuous filtration. In addition, the duration of turnovers required by most pool/spa regulations are not optimal for such a small body of saline solution, and will not effectively filter the saline solution for each new party.

Instead we prescribe a rigorous filtration process between each float. With the minimum of 3 turnovers set forth in this standard, filtration of the float tank is more thorough than any current state regulation. Because each new party is entering a saline solution that has been completely filtered and disinfected, there is no concern of cross-contamination.

Floatation Tank Association - www.floatation.org - (530) 477-1319

US Float Tank Standard

Sanitation and Safety Committee:
Ashkahn Jahromi, Shoshana Leibner, Glenn Perry, Graham Talley, and David Wasserman

Float Tank (a.k.a. Floatation Tank, Float Room/Pod, Isolation Tank, or Sensory Deprivation Tank): A tank that contains a saturated solution of magnesium sulfate having a specific gravity of 1.23 to 1.3, provides a light and sound free environment, and is maintained at a temperature of approximately 93.5°F (34.1°C).

First time users will receive a clear and thorough orientation prior to floating including:

- Instructions to shower before and after the float session
- An explanation of how to enter and exit the float tank
- Instructions on rinsing salt out of their eyes
- Instructions on preventing neck tension

Users will shower before use to enter the tank clean, and after use to remove the saline solution.

Optional earplugs and an optional neck floatation device will be provided for the user.

Users are asked to give verbal or written consent that they do not have skin diseases, infectious respiratory diseases, and epilepsy that is not under medical control. Any of these conditions will exclude them from floating until the conditions are handled.

The tank's filtration process completes at minimum 3 turnovers between each user.

Due to the enclosed nature of the tanks, the use of Chlorine or Bromine is not recommended and may lead to health concerns.

The tank's filtration process will utilize Hydrogen Peroxide (H2O2) and/or Ozone, with UV to be optionally used in conjunction with one of these two.

Water will be kept at a <200 CFU aerobic plate count with an absence of total coliform at all times.

If another method of disinfectant can be proven to effectively and safely keep the float tank at a <200 CFU aerobic plate count with an absence of total coliform, that method will be an acceptable form of disinfectant.

Each center will keep a daily log for each of their float tanks, recording:

1. Sanitizer residual that meets the requirements:
    - Hydrogen Peroxide (in ppm) - Min-Max: 20-100, Ideal Range: 30-40
    - Ozone (Max: 0.05ppm air concentration)
    - ORP - Oxygen Reduction Potential (optional) - Minimum of 650 mV
2. Water Level (minimum of 9")
3. Water Temperature (ideal range 93.5°-95.2° F [34.1° - 35.1° C])
4. Specific Gravity (1.23-1.3)
5. pH (7.2-7.6)
6. Total Alkalinity (80-120ppm)

Clean tank rooms and bathrooms will be maintained between uses.

All electrical equipment, pump equipment, and disinfection equipment is UL and/or NSF certified.

The inside of the tank above the solution line will be cleaned weekly with a sterilizer.

Maricopa County

Environmental Services Department
Water and Waste Management Division

1001 N Central Ave, Suite 150
Phoenix, Arizona 85004
Phone: (602) 506-6666
Fax: (602) 506-6925
TDD: (602) 506-6704
www.maricopa.gov/envsvc

April 30, 2009

Dear Mr. Janicki:

This letter is in response to your question about permitting an I-sopod Flotation System with the Maricopa County Environmental Service Department. At this time it will not be necessary to submit plans or to qualify for a permit with the Department. The I-sopod does not fall under the requirements of the Environmental Health Code. If you have any other question feel free to call me at 602-506-0462.

Sincerely,

Gregory Epperson
Swimming Pool Program Supervisor

Jim Doyle
Governor

Helene Nelson
Secretary

State of Wisconsin
Department of Health and Family Services

DIVISION OF PUBLIC HEALTH

1 WEST WILSON STREET
P O BOX 2659
MADISON WI 53701-2659

608-266-2835
FAX: 608-267-3241
dhfs.wisconsin.gov

December 22, 2004

David Wasserman
Oasis Relaxation Systems
P. O. Box 15569
SAN DIEGO CA 92175

Dear Mr. Wasserman:

This letter is in response to your request for an approval letter for your floatation system, which utilizes an UV lamp and hydrogen peroxide. Hydrogen peroxide is not an approved sanitizer for public pools in Wisconsin. However, we realize your floatation device is different than a standard pool or whirlpool with a maximum bather capacity of one user at a time in a controlled environment. We therefore have granted an experimental waiver for use of your float tank and will evaluate each system on a case-by-case basis.

With this approval, we require additional testing, including hydrogen peroxide residual, mandatory turnover time, cleaning frequency, and required supervision while in use. Both owners of these systems are aware of their additional requirements and we are unaware of any problems with these systems. Due to the fact that these pools are not common in this state (we have a total of 3), the Department has no intention of creating a permanent license category for these systems at this time. If you have additional questions, please call me at 608-266-8294.

Sincerely,

Tracynda Davis

Tracynda Davis, M.P.H.
Evaluation and Training Officer
Wisconsin Division of Public Health

This person has moved on from Wisconsin DOH. Bot validation remains ...

Illinois Department of
PUBLIC
HEALTH

Rod R. Blagojevich, Governor
Eric E. Whitaker, M.D., M.P.H., Director

525-535 West Jefferson Street • Springfield, Illinois 62761-0001 • www.idph.state.il.us

October 19, 2004

Cook County/Arlington Heights
Aguasal, Inc.
Proposed Floatation Tank Installation

Gentlemen:

The Illinois Department of Public Health has received an application and fee to install four floatation tanks at Aguasal in Arlington Heights.

After reviewing your submittal, the Department has determined the proposed floatation tanks do not meet the definition of a swimming facility, as specified in the Swimming Facility Act, and therefore are not regulated by the Department. A permit is not required from the Department for the installation of the floatation tanks nor is an operating license. The permit fee originally submitted with the application is being returned and is attached.

If you have any questions, please call me at 217/782-5830, (for the hearing impaired only TTY# 800-547-0466).

Sincerely,

Craig Steinheimer, P.E.
Environmental Engineer

cc: West Chicago Region