# Controlling Legionella in Hot Tubs

## **Purpose**

Use this document to:

- Help evaluate hazardous conditions associated with all types of hot tubs and whirlpool spas (including display models)
- **2.** Implement *Legionella* control measures for hot tubs per ASHRAE Guideline 12-2020
- **3.** Complement existing resources for water management programs
- **4.** Support environmental assessments conducted during public health investigations

#### **Key Points**

- Hot tubs have been associated with Legionnaires' disease outbreaks.
- All hot tubs—including display models should be operated with proper disinfectant residuals and pH.
- Public hot tubs should use automatic feed and control systems for disinfectant and pH.

Sediment and biofilm, temperature, water age, and disinfectant residual are the key factors that affect *Legionella* growth in hot tubs.

## Design

Hot tubs maintain water temperatures within the most favorable range for *Legionella* growth (77–113°F, 25–45°C), create aerosols, and accelerate the decay of disinfectants. These conditions make the following design recommendations critically important for preventing disease:

- Use automatic feed and control systems to maintain proper disinfectant residual and pH.
- Ensure easy access to all mechanical and filtration components for routine and preventive maintenance and service.

- Ensure the hot tub basin can be easily, quickly, and completely drained and refilled and is suitable for regular scrubbing and cleaning.
- Consider locating indoor hot tubs in rooms with isolated air handlers and dehumidifiers.
- Locate building air-handing system outlets and returns to reduce the potential for transmission of aerosols.
- Post signage warning of increased health risks to individuals who are immune compromised or who have chronic lung disease.



### **Operation, Maintenance, and Control Limits**

Safe operation and regular hot tub maintenance protect staff, bathers, and bystanders from exposure to *Legionella*. Use a water management program to establish, track, and improve operation and maintenance activities. Operate and maintain hot tubs of all types and sizes with the following guidelines in mind:

- Follow manufacturer recommendations and requirements of the authority having jurisdiction; areas without local regulations can use CDC's Model Aquatic Health Code (MAHC).
- Monitor and maintain a chlorine or bromine disinfectant residual and pH according to Table 1.
- Test disinfectant residual and pH at least twice per day (as often as hourly when in heavy use).
- Backwash sand and diatomaceous earth filters routinely per manufacturer recommendations.
- Replace cartridge filters on a regular basis per manufacturer recommendations.
- Ensure steady water flow across the filter 24 hours per day.
- Clearly post the maximum bather load (CDC's MAHC recommends 10 ft<sup>2</sup> per bather) and rules for appropriate use.

- Remove hot tubs from service daily to carry out disinfection with a higher than normal disinfectant residual. For example, a free residual of 10 mg/L or 10 times the combined chlorine level, whichever is greater, for at least one to four hours is commonly used.
- Drain, scrub, clean, and fill hot tubs according to Table 1.
- Ensure all staff involved in hot tub operation and maintenance are trained appropriately.
- Maintain complete operating records for hot tubs and review trends of disinfectant residuals, pH, and maintenance activities.
- Consider testing for Legionella in accordance with Routine Testing for Legionella (Page F1).

#### **Private Hot Tubs**

- All hot tubs have potential for Legionella growth if control measures are not taken.
- Monitor and maintain proper disinfectant residuals and pH, even when not in use.
- Follow manufacturer recommendations for cleaning, filter replacement, and all other maintenance activities.

#### Remediation

If an outbreak or illness is suspected, test in conjunction with public health in order to:

- Confirm the presence of Legionella before performing remediation.
- Confirm Legionella elimination after remediation activities.

If control measures are ineffective or if routine test results indicate poor *Legionella* control, and there are NO illnesses, then consider the following remediation steps:

- 1. Remove the hot tub from service.
- Increase disinfection by adding disinfectant and maintaining 10 ppm free chlorine for 1 hour.

- 3. **Drain** the water.
- **4. Scrub,** clean, and rinse all hot tub surfaces with fresh potable water and drain as needed.
- **5.** Clean and service filters according to manufacturer recommendations.
- 6. Refill with fresh potable water.
- **7. Return** the hot tub to the routine disinfectant residual level.
- **8. Resume** service once performance indicators are consistent with *Legionella* control and are within control limits.

If an outbreak or illness is suspected by the public health authority having jurisdiction (AHJ), do the following. Note: The public health AHJ determines whether there are associated illness(es) or an outbreak.

- 1. Remove the hot tub from service.
- **2. Drain** the hot tub after collection of samples per public health instructions.
- Scrub and clean all surfaces, including skimming devices and weirs, using water with a minimum free chlorine concentration of 5 ppm.
- **4. Rinse** all hot tub surfaces with fresh potable water and drain as needed.
- 5. Replace filters or filter media (if applicable).

- 6. Repair parts as needed.
- 7. Refill the hot tub with fresh potable water.
- 8. Hyperchlorinate the water to 20 ppm free chlorine. Circulate hyperchlorinated water with jets off for 1 hour. Circulate hyperchlorinated water with jets on for 9 additional hours.

  Maintain a minimum free chlorine residual of 20 ppm for a total of 10 hours.
- Flush the entire system with fresh potable water and refill.
- **10. Return** the hot tub to the routine disinfectant residual level.
- **11. Resume** service in coordination with public health authority.

## Managing Legionella Risk in Display Hot Tubs

- A hot tub on display that contains water also requires disinfectant.
- Residual disinfectant (free chlorine: 3–10 ppm, bromine: 4–8 ppm) and pH (7.2–7.8) should be monitored twice a day.<sup>†</sup>
- Maintain complete operating records for display hot tubs, including disinfectant residual levels, pH, and maintenance activities.

Table 1. Legionella Control Measures for Hot Tubs and Whirlpool Spas\*

Water Parameter	Control Measure	Recommendations**
Sediment and Biofilm	Cleaning frequency	Vigorously scrub all surfaces each time tub is drained.
Temperature	Control limits unlikely met due to operating conditions	<ul> <li>Hot tubs operate within the favorable growth range for <i>Legionella</i> (77–113°F, 25–45°C).</li> <li>Additional measures are required to control <i>Legionella</i>.</li> <li>Water should not exceed 104°F (40°C) to prevent scalding.</li> </ul>
Water Age	Bather load, frequency of use	<ul> <li>Water replacement frequency in days = (Spa volume in gallons/3)/average # users per day.<sup>†</sup></li> </ul>
Disinfectant Residual <sup>‡</sup>	Control limits	<ul> <li>pH: 7.2–7.8<sup>†</sup></li> <li>Free chlorine: 3–10 ppm<sup>†</sup></li> <li>Bromine: 4–8 ppm<sup>†</sup></li> </ul>

<sup>\*</sup>The listed control measures were last updated according to ASHRAE Guideline 12-2020 and CDC's 2018 MAHC. View the current versions of ASHRAE Guideline 12 and MAHC for the most up-to-date recommendations.



<sup>\*\*</sup> See Managing Legionella Risk in Display Hot Tubs section for recommendations for controlling Legionella in display hot tubs.

<sup>†</sup>Recommendation based on guidance from MAHC, accessible at: https://www.cdc.gov/mahc/editions/current.html.

<sup>&</sup>lt;sup>†</sup>Cyanuric acid or stabilized chlorine products should not be used in hot tubs as they slow disinfection.

#### Resources

- Toolkit for Controlling Legionella in Common Sources of Exposure: <a href="https://www.cdc.gov/legionella/wmp/control-toolkit/index.html">https://www.cdc.gov/legionella/wmp/control-toolkit/index.html</a>
- Toolkit: Developing a Water Management Program to Reduce Legionella Growth and Spread in Buildings: <a href="https://www.cdc.gov/legionella/wmp/toolkit/index.html">https://www.cdc.gov/legionella/wmp/toolkit/index.html</a>
- Legionella Environmental Assessment Form: <a href="https://www.cdc.gov/legionella/downloads/legionella-environmental-assessment.pdf">https://www.cdc.gov/legionella/downloads/legionella-environmental-assessment.pdf</a>
- PreventLD Training: <a href="https://www.cdc.gov/nceh/ehs/elearn/prevent-LD-training.html">https://www.cdc.gov/nceh/ehs/elearn/prevent-LD-training.html</a>
- Display Hot Tub Fact Sheet: <a href="https://www.cdc.gov/nceh/ehs/docs/factsheets/hot-tub-displays-ld-risk-p.pdf">https://www.cdc.gov/nceh/ehs/docs/factsheets/hot-tub-displays-ld-risk-p.pdf</a>
- Operating Public Hot Tubs Fact Sheet: <a href="https://www.cdc.gov/healthywater/pdf/swimming/resources/operating-public-hot-tubs-factsheet.pdf">https://www.cdc.gov/healthywater/pdf/swimming/resources/operating-public-hot-tubs-factsheet.pdf</a>
- Model Aquatic Health Code: <a href="https://www.cdc.gov/mahc/">https://www.cdc.gov/mahc/</a>
- ASHRAE Guideline 12-2020: https://www.ashrae.org/technical-resources/standards-and-guidelines/guidance-on-reducing-the-risk-of-legionella