

[REDACTED]

[REDACTED]

[REDACTED]

Thank you for participating in the on-site meeting [REDACTED] on [REDACTED] with [REDACTED] [REDACTED] regarding your water management program and assessment for *Legionella*. We appreciate all the steps that you have taken to date regarding surveillance and assessment activities.

### Case Identification

- Should any guests or staff report respiratory illness or pneumonia either during or following a stay at your facility, please share that information with Public Health Epidemiology (c/o [REDACTED] [REDACTED]). Epidemiology can investigate further to determine if the illness is consistent with *Legionella*.
- Public Health at the local, state, and national level will continue to monitor *Legionella* cases for reports of travel during the incubation period, and will notify you if any other cases are identified as possibly associated with your facility.

### Environmental Assessment and Management Program Activities

- It is important to move forward with technical assessment of the water distribution system for the facility. [REDACTED]
- **Please consult with a premise plumbing engineer or industrial hygienist with expertise in remediation for and control of *Legionella* by [REDACTED].**
- Your consultant should conduct an on-site technical assessment of the hot water distribution system, cold water distribution system, and any other plumbed water features at the facility. That assessment should be conducted in the context of a *Legionella* investigation, and should therefore identify any features of the water system with the potential to enable *Legionella* growth, biofilm presence, and *Legionella* exposure.
- Upon completion of the technical assessment, the contractor should develop a sampling plan for *Legionella*. We request that the sampling plan be submitted for Public Health review [REDACTED] [REDACTED] prior to sample collection to ensure that the sampling plan is appropriate for public health purposes. The sampling plan should be submitted by [REDACTED].
- Test for *Legionella* throughout your facility in conjunction with an ELITE laboratory. **It is important to have water samples collected by someone experienced with testing for *Legionella*.** Your contracted engineer, the ELITE laboratory, or [REDACTED] should be able to help with this. [REDACTED]
- Please share all environmental test results with Public Health Epidemiology (c/o [REDACTED] [REDACTED] within two business days of receipt from the testing laboratory.
- Should *Legionella* be detected, it is important to conduct emergency remediation of your water distribution system. Thermal eradication or shock chlorination should be conducted as soon as possible. After emergency remediation has been conducted, long-term management activities can

be implemented. Please consult with your contracted environmental engineer for assistance with both emergency and long-term *Legionella* remediation.

- Conduct testing for free chlorine throughout your facility, including at the point of introduction from the municipal water source. The free chlorine residual should be greater than or equal to 0.5 ppm throughout the system to prevent *Legionella* growth. The EPA maximum residual disinfectant level for chlorine is 4 ppm.<sup>1</sup>
- Monitor temperatures throughout your facility, including at the point of introduction from the municipal water source. Cold water should circulate throughout the entire cold water distribution system at temperatures equal to or lower than 68°F to prevent *Legionella* growth. Hot water should circulate throughout the entire hot water distribution system at temperatures equal to or greater than 125°F to prevent *Legionella* growth.<sup>2</sup>
- *Legionella* growth and proliferation can be prevented through multiple mechanisms. Measures must be undertaken to prevent *Legionella* in both the hot water distribution system and the cold water distribution system. Prevention efforts may be different for each system depending on what works best for your facility. These efforts should be incorporated into the water management program. ***Legionella* prevention activities should be determined in conjunction with your contracted technical advisor.**
- Incorporate flushing of low-use fixtures into your water control and management plan, where not already included. Include any emergency water systems as they are likely to be low-use. Additional recommendations for the water control management plan are available in the CDC toolkit and ASHRAE Standard 188-2015.<sup>3,4</sup>

### Communication

Thank you again for your communication to date. We will move forward with communication via email and will schedule conference calls to review ongoing activities as-needed. Please feel free to reach out to Public Health Epidemiology (c/o [REDACTED]) if you have any questions. [REDACTED] are happy to coordinate with your facility regarding any public communications or requests, as well.

Sincerely,

[REDACTED]

### References

1. EPA: Comprehensive Disinfectants and Disinfection Byproducts Rules (Stage 1 and Stage 2): Quick Reference Guide <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100C8XW.txt>
2. OSHA Technical Manual Section III: Chapter 7 [https://www.osha.gov/dts/osta/otm/otm\\_iii/otm\\_iii\\_7.html](https://www.osha.gov/dts/osta/otm/otm_iii/otm_iii_7.html)
3. CDC: Developing a Water Management Program to Reduce *Legionella* Growth and Spread in Buildings <http://www.cdc.gov/legionella/downloads/toolkit.pdf>
4. ASHRAE Standard 188-2015. Legionellosis: Risk Management for Building Water Systems. (2015)