

Managing Waterborne Pathogens & ASHRAE Standard 188



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Agenda

- Why ASHRAE Standard 188?
 - Legal aspects and industry trends
- Waterborne Pathogens
 - Legionella...hiding in plain sight
 - Understanding Legionella & Biofilm
 - Ice Machines, Ventilator-associated pneumonia (VAP), air conditioners/cooling towers, spas, fountains...
 - Plumbing Systems & dead-legs
- Water Treatment Pos/Cons
 - Mechanical
 - Chemical
- Meet the new Standard
 - Scope
 - Understanding the core elements
 - What does a Water Management Plan based on ASHRAE Standard 188 actually look like?

Why the New Standard?

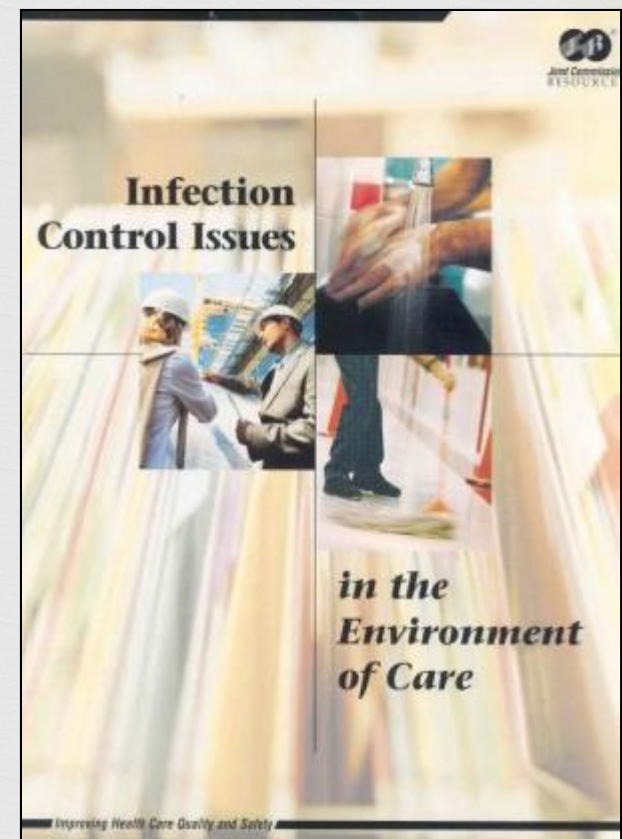
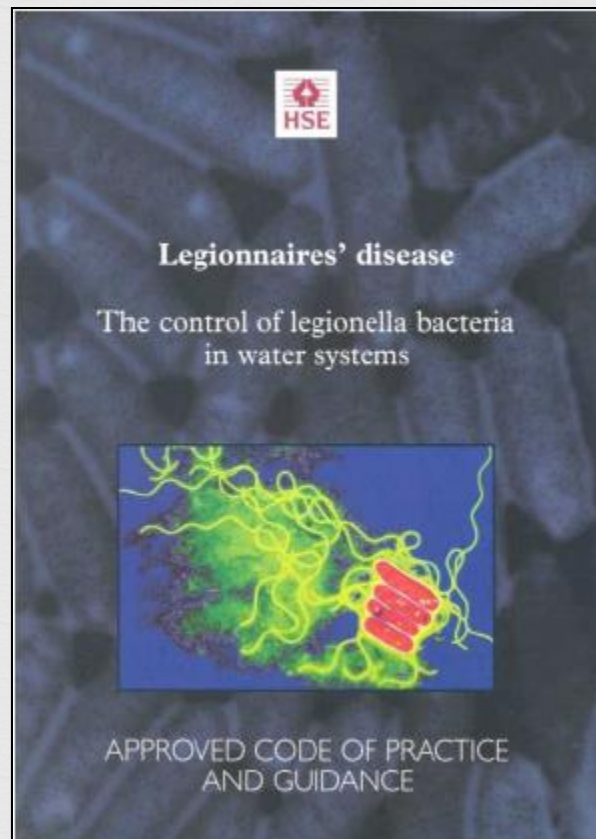
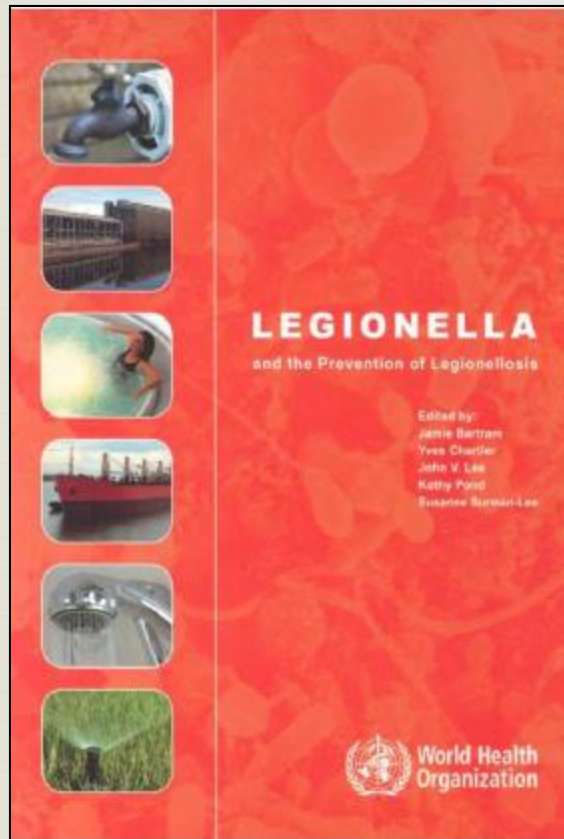


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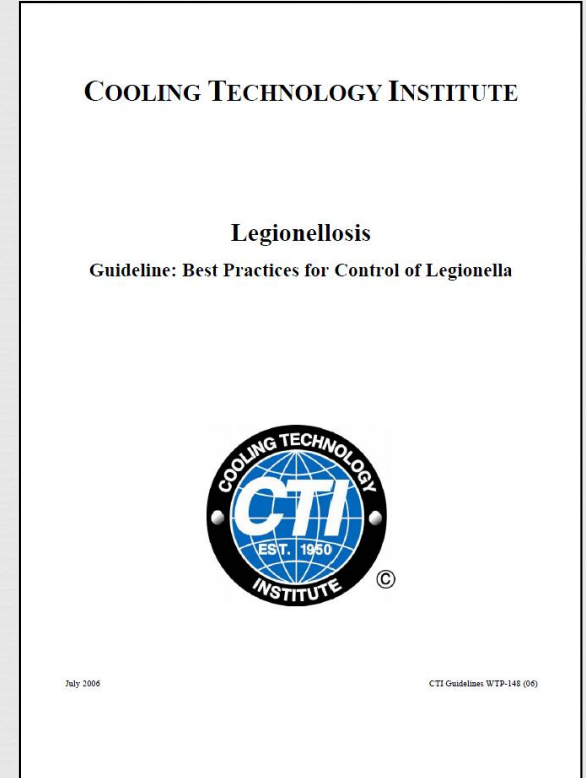
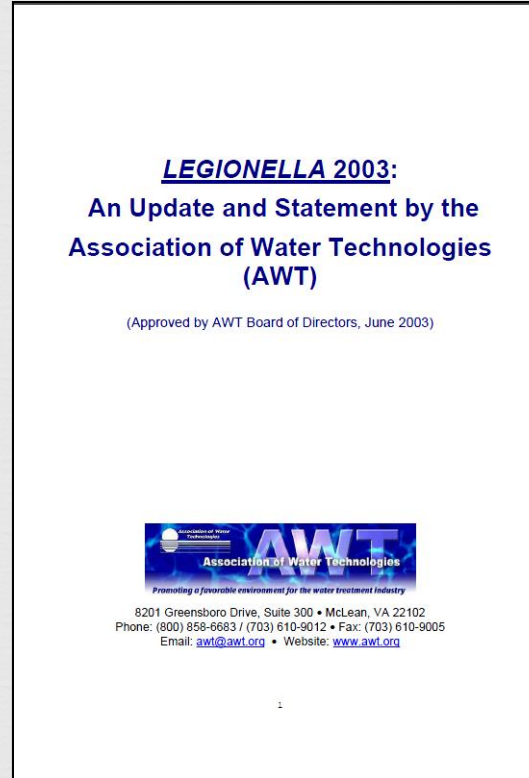
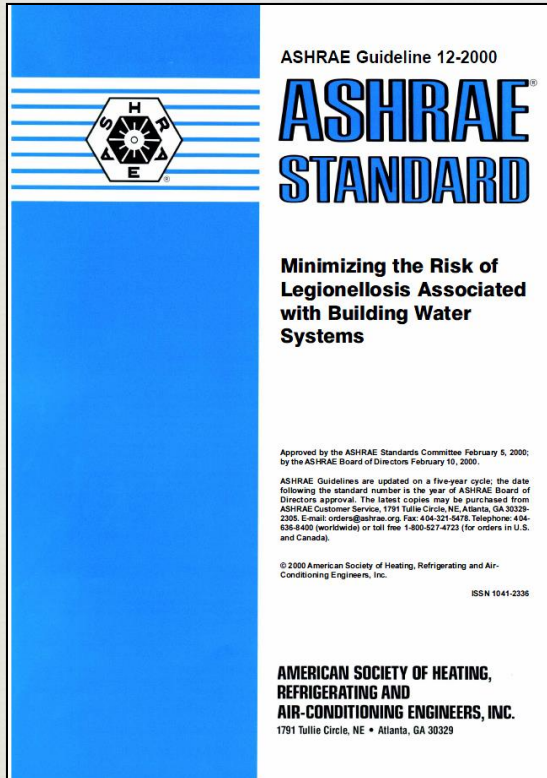


We Currently Have Lots of Guidance Documents, Why do We Need Another One?

Lots of Legionella Guidance Documents



Lots of Legionella Guidance Documents



The Law 40 Years Later



To date, there has been little uniformity in what actions, if any, designers, owners and facility managers should take to guard against the waterborne bacteria that cause Legionnaires' disease

Courts Do Not Look At Current Guidelines as Setting Industry Standards



“The Lack of Uniformity Contributes to Healthcare Exposure to Legal Liability When Illness or Death Occurs from Legionnaires’ Disease”



Saul Ewing
LLP

Industry Trend – a Policy of Avoidance



Most wait to address the problem until after a case or cases of Legionnaires' disease are diagnosed



Legionnaires' Outbreaks Preventable with Water Management Programs



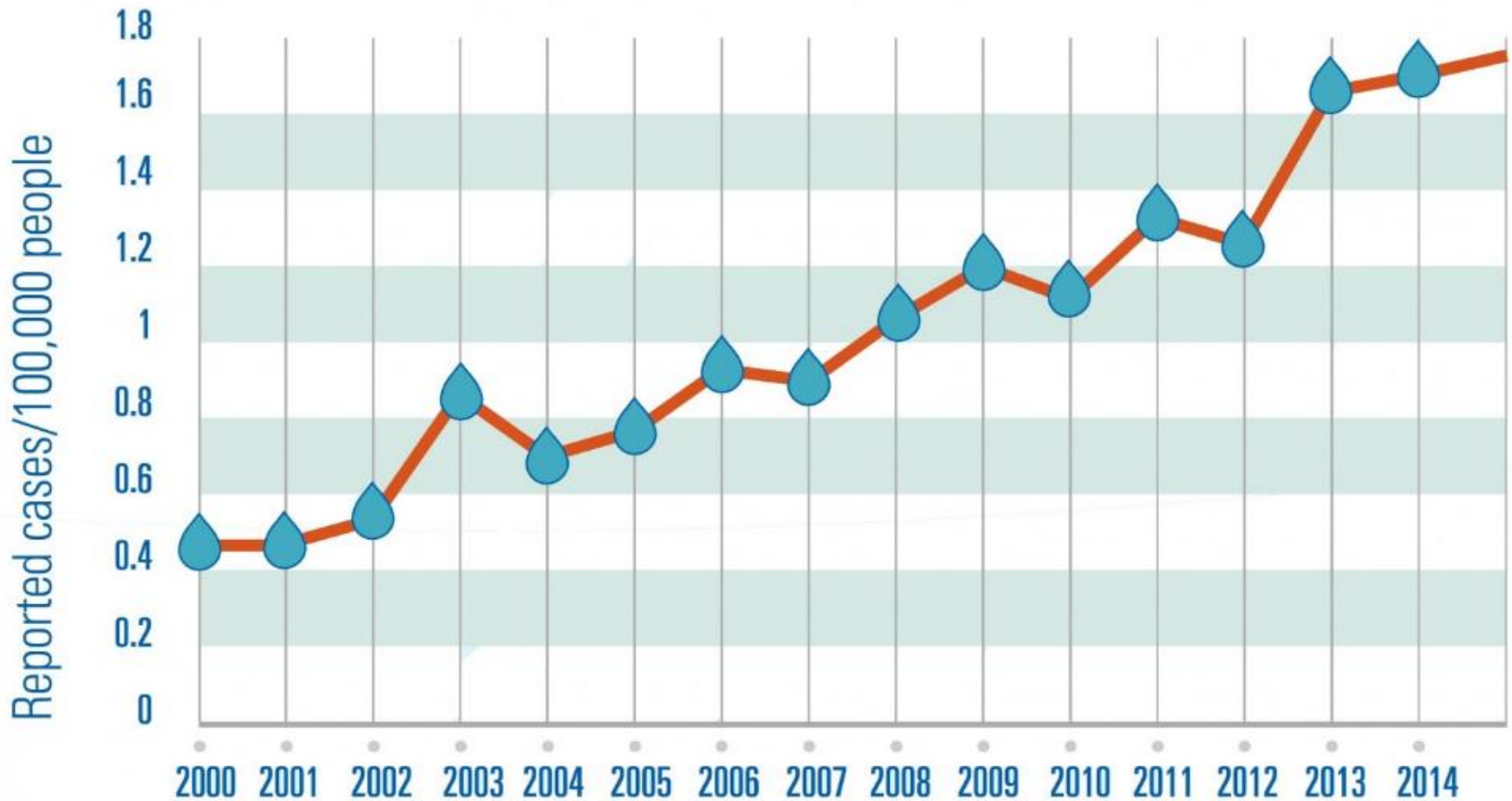
“The most important finding from the CDC’s Morbidity and Mortality Weekly Report is that the vast majority of outbreaks could have been prevented if facility staff had implemented a water management program, as suggested by Standard 188-2015.”

NOVEMBER 2016 ashrae.org ASHRAE JOURNAL

Legionnaires' outbreaks: Cases nearly quadrupled in 15 years



The Washington Post



When Do We Test for Legionella & When do we Develop A Plan to Control Legionella



Infection Control & Clinical Quality

Pittsburgh prison knew about contaminated water months before medical director died from Legionnaires'

Written by Brian Zimmerman | November 21, 2016 | [Print](#) | [Email](#)



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On Aug. 9, Joseph Mollura, MD, the 60-year-old medical director for State Correctional Institution – Pittsburgh, died from complications related to pneumonia. The condition was likely spurred by a *Legionella* bacterial infection. Three months prior to Dr. Mollura's death, the bacteria was detected in one of the prison's cooling towers. Employees weren't notified about the contamination issue until Sept. 1, according to a report [Trib Live](#).

New York Ordering Tests of Water-Cooling Towers Amid Legionnaires' Outbreak

By WINNIE HU and NOAH REMNICK AUG. 6, 2015



Mayor Bill de Blasio announced on Thursday that building owners will be required to assess and clean water-cooling towers. Bryan R. Smith for The New York Times

NYC Death Toll in Legionnaires' Outbreak Rises...



**Death Toll in Legionnaires'
Outbreak Rises to 12 [with 124
cases] as 2 More Buildings Test
Positive for Bacteria**

Legionella Outbreak NYC



- ❧ “The city has an opportunity to be a leader in the country with coming up with a strong regulation that could help people from becoming sick and dying,” said Patrick Racine, a member of a committee for legionellosis risk-management with the American Society of Heating, Refrigerating and Air-Conditioning Engineers. “Sometimes it takes events like this to get people to jump into action.”
- ❧ At the news conference on Tuesday, Mr. de Blasio said the city planned to tighten regulation of the towers, but in recent days, community leaders, neighborhood residents and industry experts have faulted the city for failing to have a more rigorous inspection regime in place.

Question & Answer



- ❧ Why with all the guidance and Standards documents, we still do not have control of Legionella?
- ❧ What impact may the NYC outbreak have on ASHRAE Standard 188 nationally?
- ❧ What relevance might this have for Industry?
- ❧ How is the public reacting to Legionella outbreaks?



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How is the Public Reacting to Legionnaires Disease



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Jules Zacher is an Attorney Representing Victims of Legionnaires' disease Nationally.

This site contains news and information on Legionnaires' disease, from both a general and legal perspective.

How is the Public Reacting to Legionnaires Disease



Nov
30
2016

Cooling tower confirmed as one source of Ohio outbreak

 Case Overviews, Reported and Suspected Outbreaks

Nov
18
2016

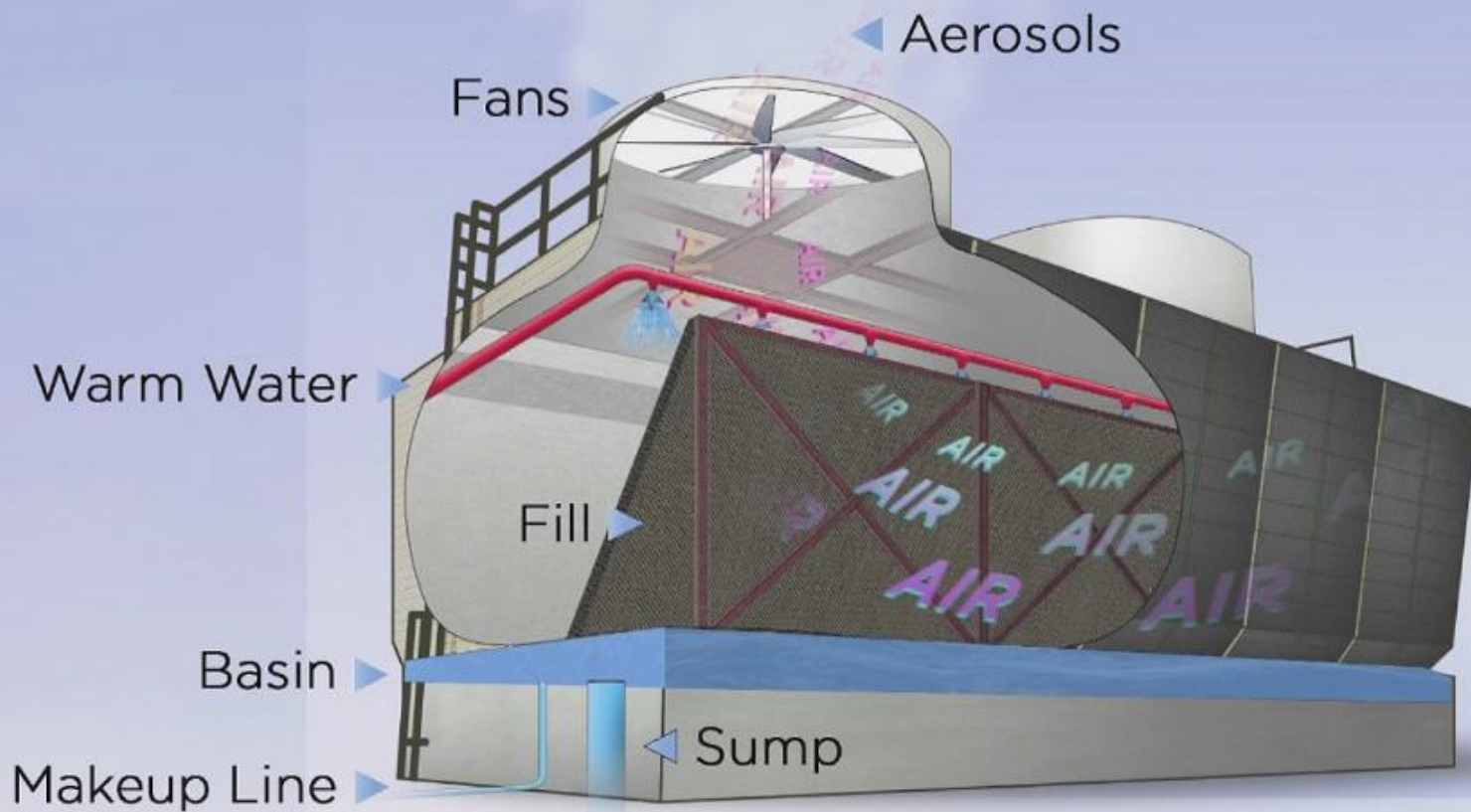
One dead and 10 more ill with Legionnaires' disease in Lake County, Ohio

 Reported and Suspected Outbreaks

A blue-toned microscopic image showing several spherical viruses with surface proteins, set against a background of a grid and light rays.

Cooling Towers and Pathogens

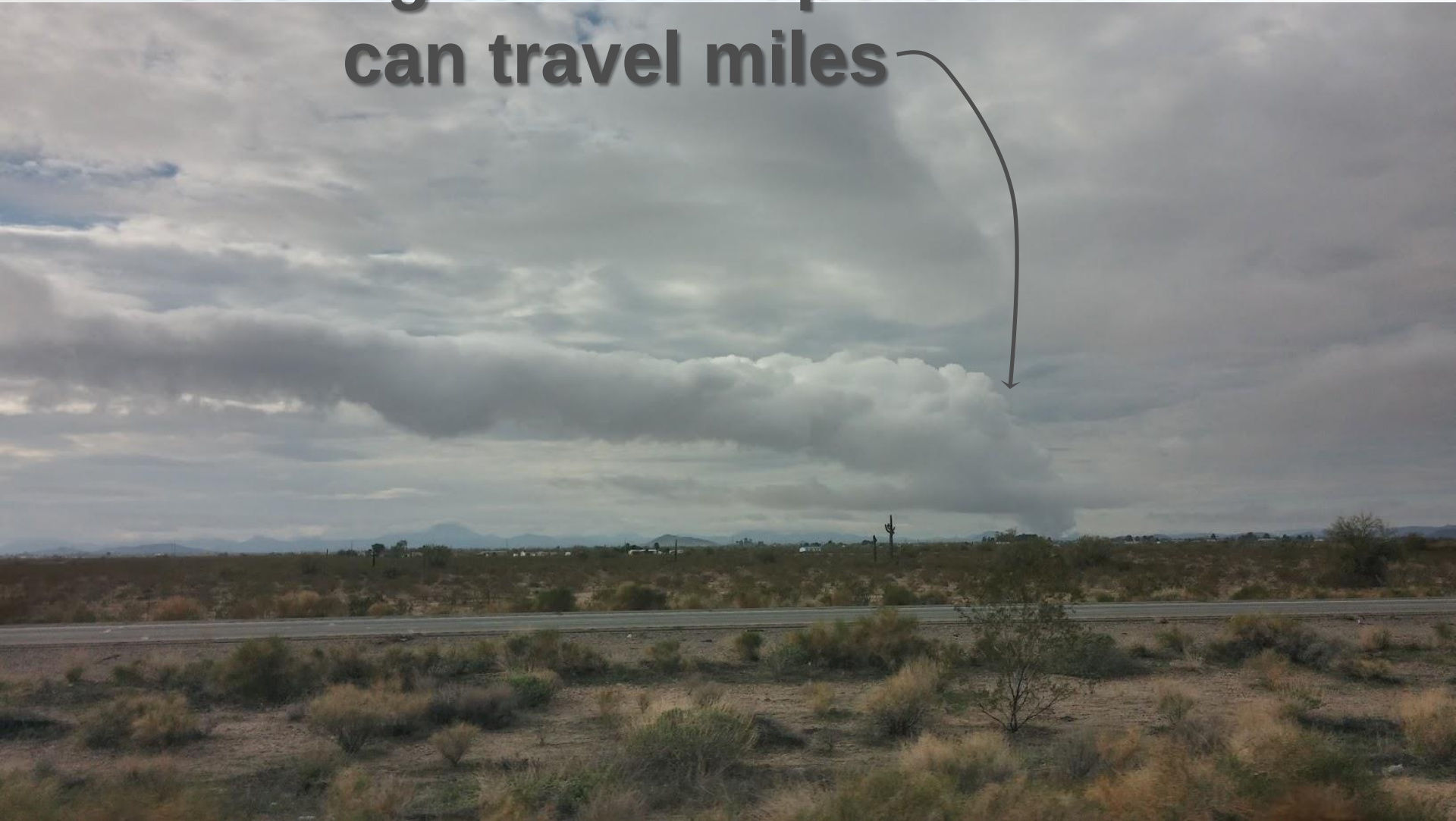
- **Question:** Where do they come from?
 - **Answer:** Air pulled into the tower and makeup water
- **Question:** Do all cooling towers have pathogens?
 - **Answer:** Inevitably yes
- **Question:** Do all cooling towers have *Legionella pneumophila*?
 - **Answer:** No



Cooling towers, which are often part of the air conditioning systems of large buildings, are a common source of *Legionella* exposure in outbreaks. Cooling towers need to be properly maintained in order to prevent Legionnaires' disease. (CDC)

A blue-tinted microscopic image showing several spherical virus particles with surface proteins. One large particle in the foreground has several spike-like proteins protruding from its surface. Other smaller particles are visible in the background.

Cooling tower Evaporation can travel miles



A microscopic view of several spherical cells, some with small protrusions, set against a blue background with a grid pattern.

Cooling towers could be evolutionary hotspots for new respiratory diseases” according to Texas A&M microbiologist Jeffrey Cirillo.

According to Dr. Cirillo and other researchers, “Many species of bacteria, including those that cause legionnaires' disease, are thought to have evolved in association with an amoebic host. Now it seems that the warm, wet conditions found in cooling towers make them a perfect spot for amoebas and bacteria to thrive, increasing the chances of new strains of pathogenic bacteria emerging.”

Common Waterborne Pathogens



Cryptosporidium - parasite
Escherichia coli - bacteria
Giardia lamblia - parasite
Hepatitis A - virus
Pseudomonas aeruginosa
- bacteria
Stenotrophomonas
maltophilia - bacteria
Acinetobacter - species
Legionella pneumophila -
bacteria



Legionella Bacteria

Legionella pneumophila
Family Legionellaceae

**Gram-negative, non-spore-forming
aerobic bacillus**



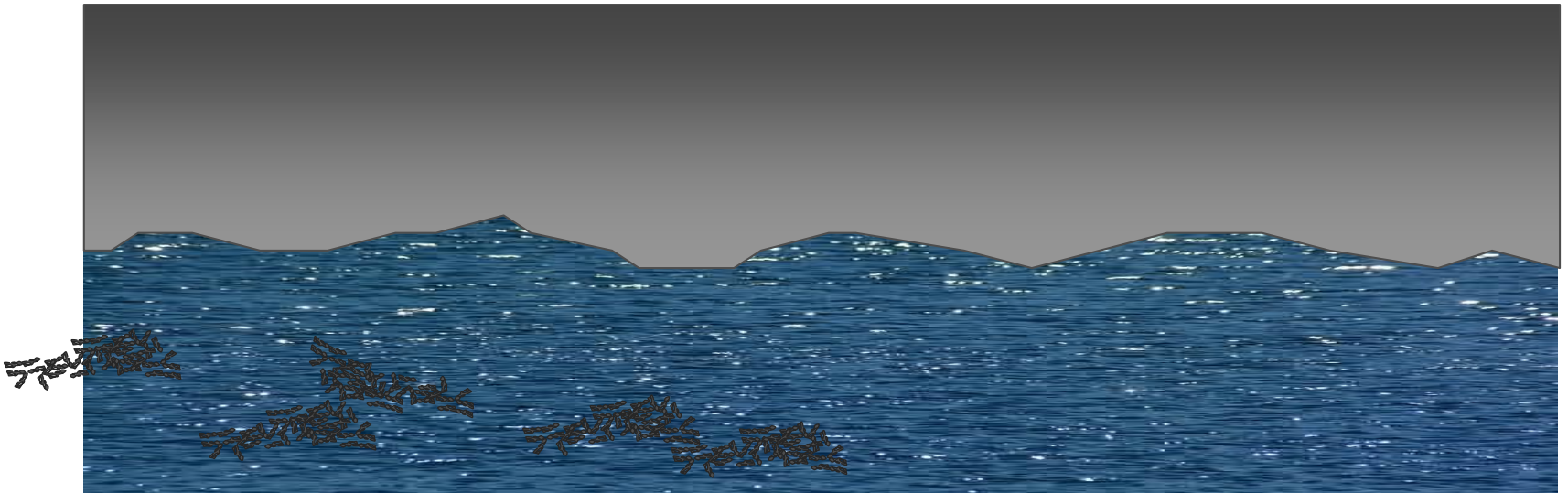
A blue-tinted microscopic image showing several spherical Legionella bacteria. The bacteria have a textured surface with small protrusions and are set against a background of faint, glowing lines and other smaller bacterial forms.

Legionella – Hiding in Plain Sight

A large, solid dark gray rectangle that serves as a placeholder for an image or diagram.

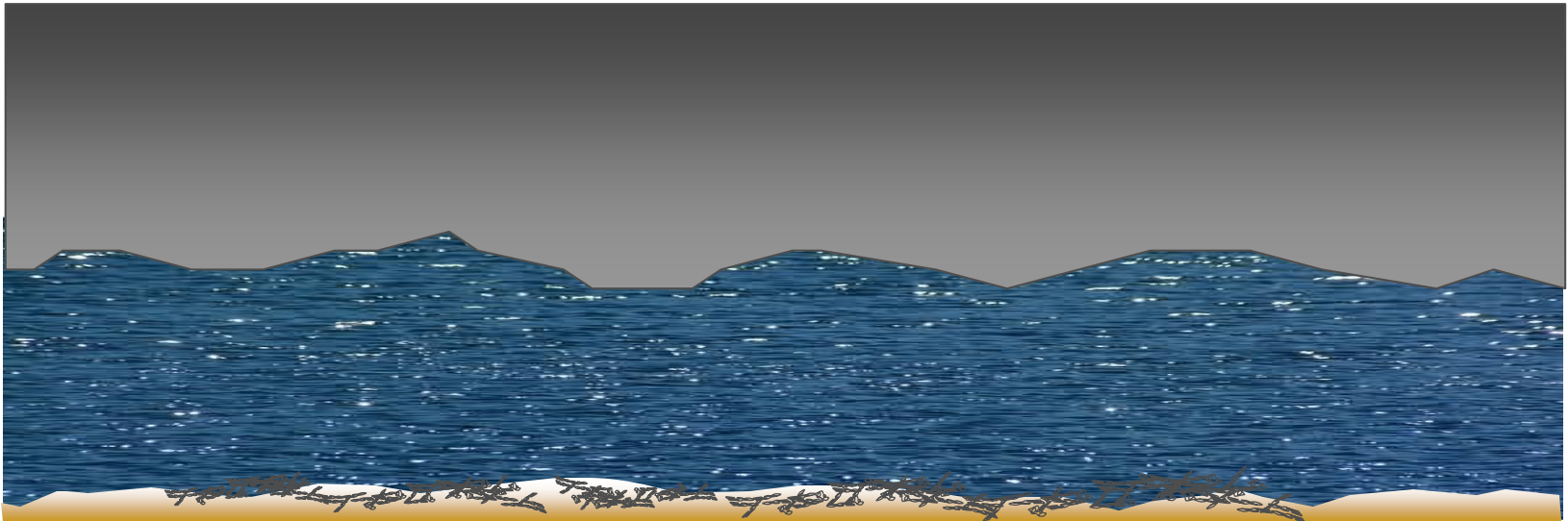
New cooling tower and potable water system clean
piping

Stage 1- Biofilm forming bacteria enters domestic water system



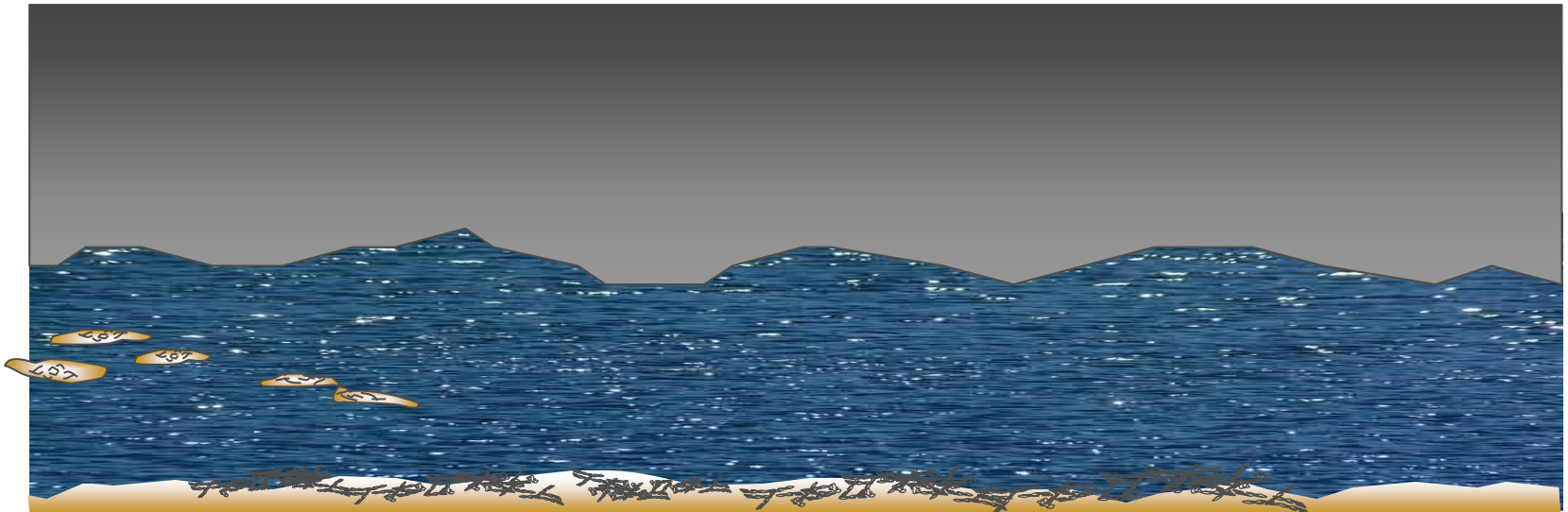
Example, *Pseudomonas aeruginosa* (slime former), a very common and highly opportunistic pathogen

Stage 2- Bacteria creates active biofilm

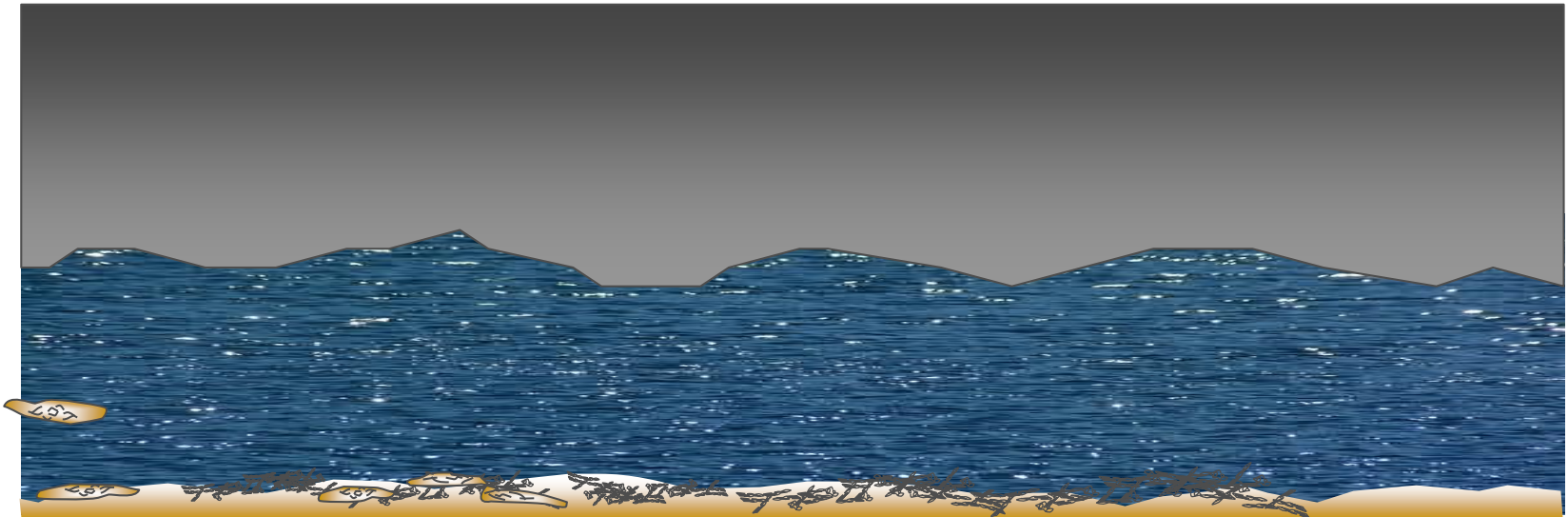


- Ability to create monolayer biofilm in 15 minutes
- A functional population of 5×10^8 colonies in 4 days
- The biofilm matrix is 15% cells and 85% polysaccharide

Stage 3- Legionella enters system with protozoan host

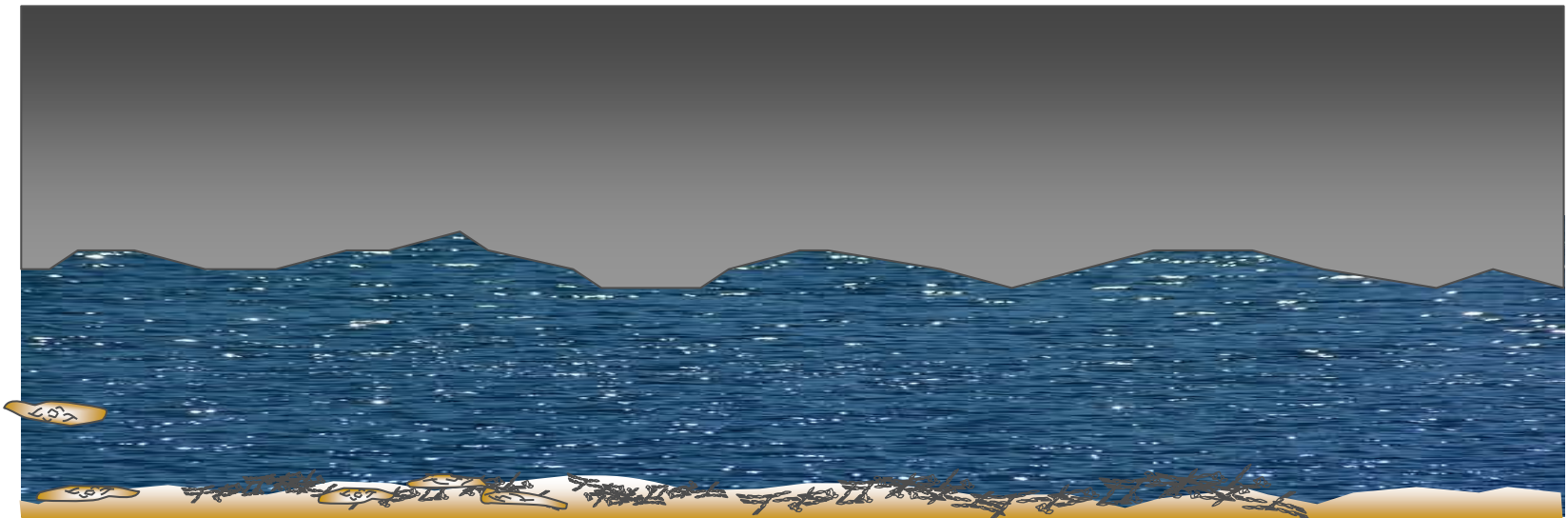


Stage 4- Active biofilm becomes habitat for protozoan & Legionella



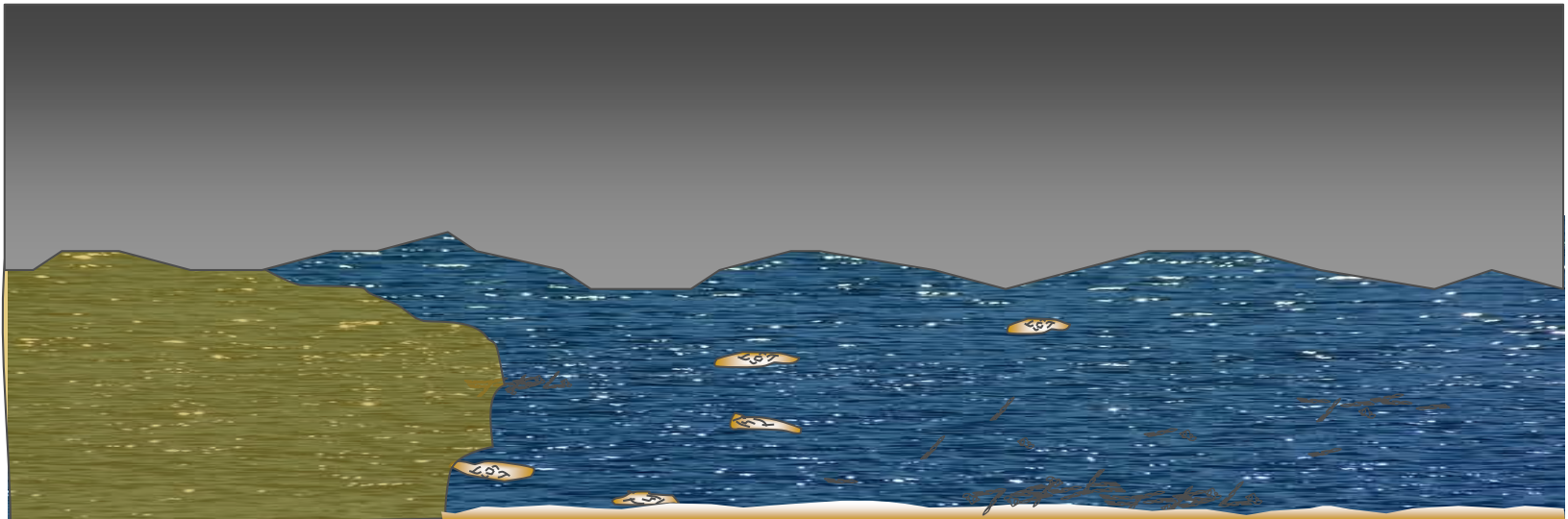
Legionella and Protozoan host flourish in and are protected by biofilm matrix from external factors.

Stage 5- Initial attempts at controlling Legionella: Hyperchlorination



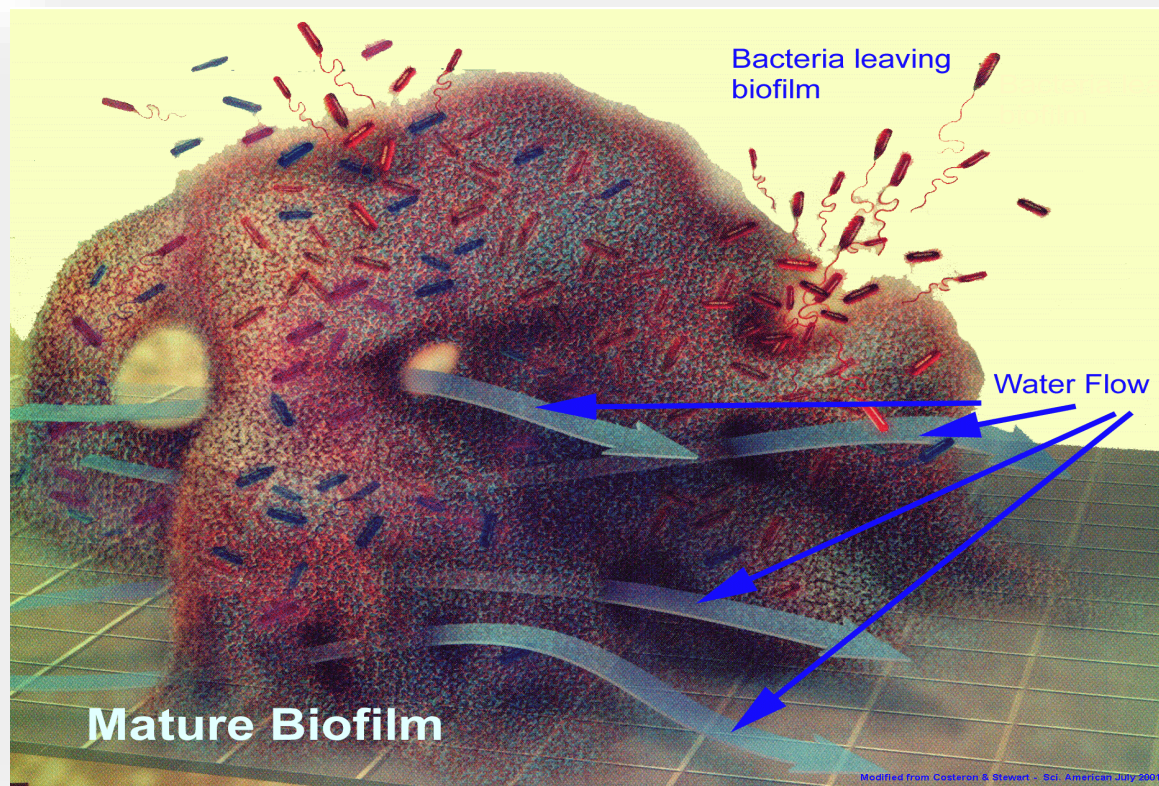
Kill minor colonies of Legionella in bulk water system, has little affect on biofilm layer and therefore no impact on protozoan/Legionella colonies

Stage 6- System upset disrupts biofilm



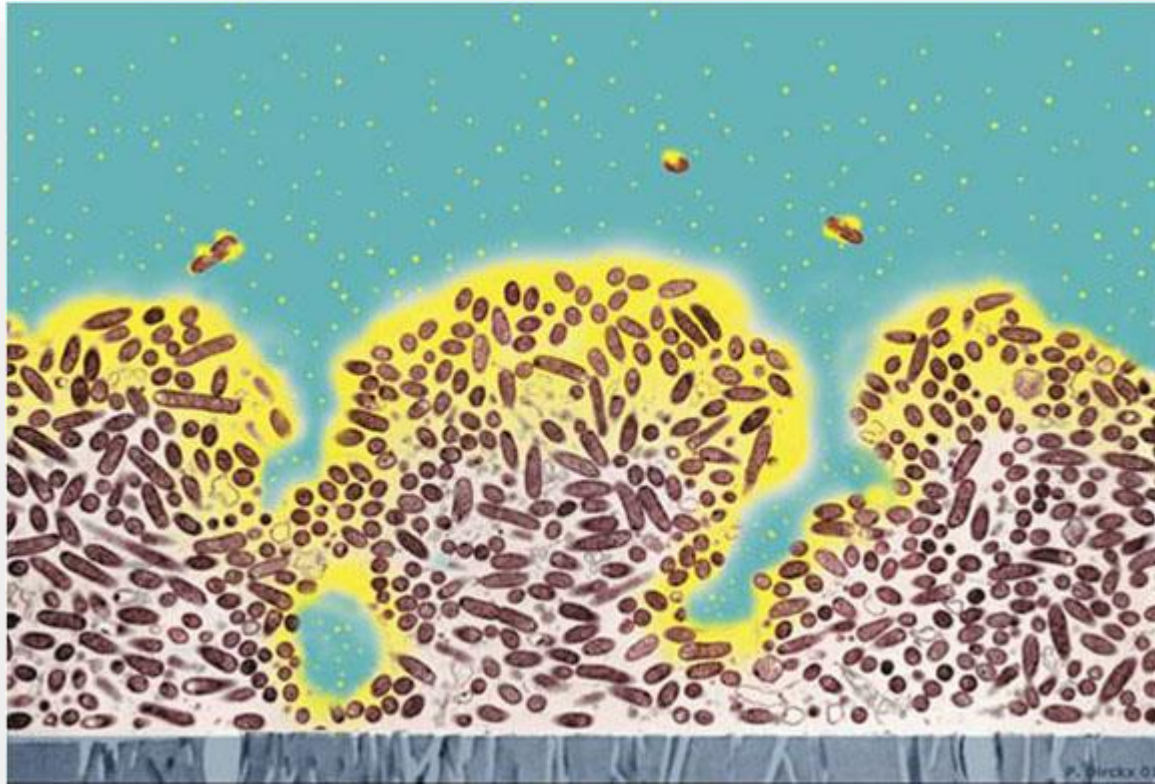
Disrupted biofilm actively releases Protozoa and Legionella into bulk water system.

Biofilm chemistry



Typical biofilm

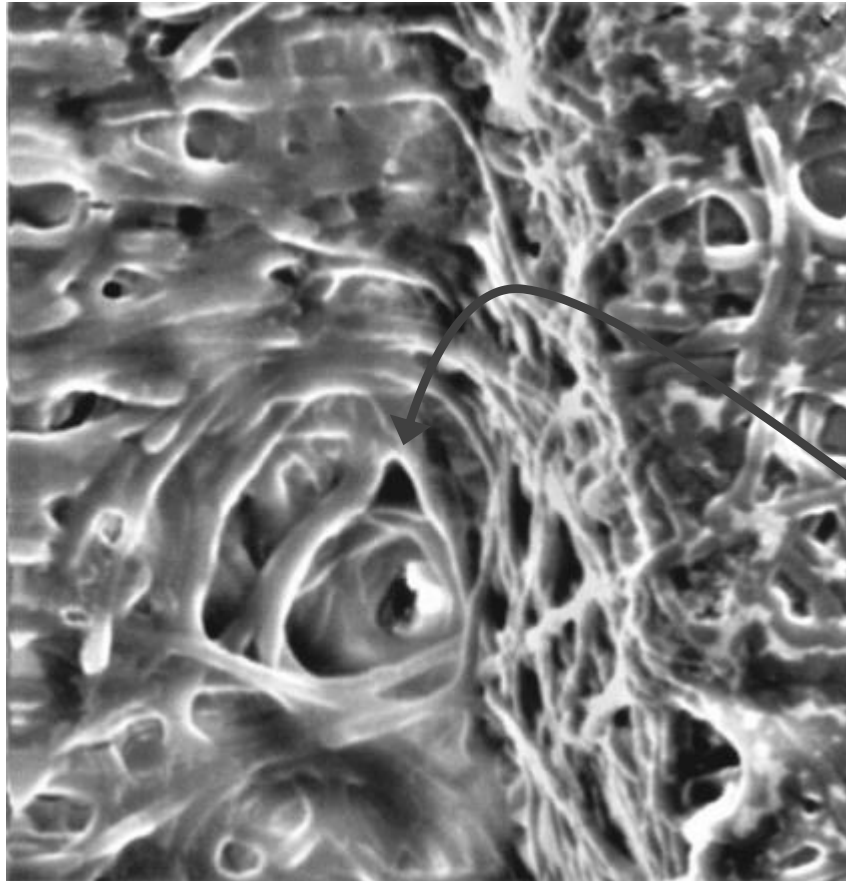
Biofilm chemistry



**Biocide applications
typically kill only
surface bacteria**

**Remaining bacteria
react by creating
more biofilm**

Biofilm chemistry



50 to 90% of biofilm is a non-uniform hydrated polysaccharide matrix composed of microcolonies of different bacteria. Example is The gram-negative facultative anaerobic pathogen *Pseudomonas aeruginosa*. Anionic properties are conferred to the biofilm by the bacteria allowing Divalent cations to cross-link strengthening the film.

A water channel is seen in the biofilm matrix.



Where Do We Find Legionella

- Legionella bacteria found in hospital ice machines at UPMC Presbyterian
- Legionella Outbreak from Ice Machine at the Super 8 Motel on College Street in Lacey, Washington.
- Brisbane hospital ice machine tests positive for legionella pneumophila following patient diagnosis
- Ventilator-associated pneumonia (VAP)
- Cooling towers, Spas, fountains, plumbing and dead-legs, HVAC systems

Water Treatment Pros/Cons



Mechanical

- Sub micron Point-of-Use Filtration
- Superheat and Flush; 60-70 °f for 30 minutes
- Ultra Violet Light; Not recommended

Chemical

- Chlorine; .5-1.0 free residual
- Shock Hyperchlorination; 20–50 mg/L of free chlorine
- Chlorine Dioxide; .3-.5 mg/l
- Ozone; not recommended
- Monochloramine; 2-3 mg/l
- Copper/Silver; copper and silver ion concentrations control 0.30 and 0.02 ppm, respectively

Meet The New Standard



Effective June 26, 2015

STANDARD



ANSI/ASHRAE Standard 188-2015

Legionellosis: Risk Management for Building Water Systems

Approved by the ASHRAE Standards Committee on May 27, 2015; by the ASHRAE Board of Directors on June 4, 2015; and by the American National Standards Institute on June 26, 2015.

Scope



2.1 This standard provides minimum legionellosis risk management requirements for the design, construction, commissioning, operation, maintenance, repair, replacement, and expansion of new and existing buildings [Plants] and their associated (potable and nonpotable) water systems and components.

4.2 Building Owner Requirements



4.2.1 The building owner [or facility manager] shall survey each existing building, new building, and any renovation, addition, or modification to an existing building and its water systems as described in Section 5.

The survey and conformance with the compliance requirements of Section 4 must occur prior to occupancy of a new building [plant] and before construction begins on renovations, additions, or modifications to existing buildings [Plants].

Elements of a Water Management Program



PROGRAM TEAM—Identify persons responsible for Program development and implementation.

DESCRIBE WATER SYSTEMS/FLOW DIAGRAMS—Describe the potable and nonpotable water systems within the building and on the building site and develop water-system schematics.

ANALYSIS OF BUILDING WATER SYSTEMS—Evaluate where hazardous conditions may occur in the water systems and determine where control measures can be applied.

CONTROL MEASURES—Determine locations where control measures must be applied and maintained in order to stay within established control limits.

MONITORING/CORRECTIVE ACTIONS—Establish procedures for monitoring whether control measures are operating within established limits and, if not, take corrective actions.

CONFIRMATION—Establish procedures to confirm that

- the Program is being implemented as designed (verification), and
- the Program effectively controls the hazardous conditions throughout the building water systems (validation).

DOCUMENTATION—Establish documentation and communication procedures for all activities of the Program.

A2. DESIGNATED TEAM LEADERSHIP



- a. a person with senior organizational leadership authority to make command decisions about water restrictions or other response measures;
- b. a member of the facilities management staff familiar with the *building [Plant] water systems*; and
- c. Others – Suppliers, Consultants

Personal Responsibility



The program documents shall include identification of the responsible persons for every step of each *Program* requirement.

Control Measures



6.2.5 Control Measures. Based on the results of the *analysis of building [Plant] water systems* in Section 6.2.4, the *Program Team* shall determine the *control measures* to be maintained.

Control measures shall include preplanning of physical design and equipment siting. *Control measures* shall include treatment methods, technical and physical processes, and procedures and activities or actions that monitor or maintain the physical or chemical conditions of water to within established *control limits*.

7.2 Cooling Towers and Evaporative Condensers



- 7.2.4 Water Treatment.** The *Program* documents shall include the water treatment requirements to *control* microbiological activity, scale, and corrosion and shall also
- a. specify all equipment and chemicals used for the purpose of treating the open recirculating loop;
 - b. include the minimum required schedule for inspection, maintenance and *monitoring*, and a *corrective actions* plan; and
 - c. identify the minimum requirements for documenting system water treatment.

The core elements to the successful implementation of ASHRAE Standard 188 are:



Verification

❧ “initial and ongoing confirmation that the *Program* is being implemented as designed.”

Validation

❧ “initial and ongoing confirmation that the *Program*, when implemented as designed, effectively controls the *hazardous conditions* throughout the *building [plant] water systems*.”

Question: Why can't your current water treater simply implement the plan for you?



Answer: Because a water treatment supplier is not recognized by ASHRAE 188 as a 'responsible' entity such as an owner, manager or contractor

The Final Element is the Water Management Plan Document (Verification)



The plan is to be reviewed and update yearly



What About Validation?



Validation is monitoring and corrective action. Taking water and culture samples, ensuring control parameters are maintained and documenting hazardous conditions are effectively being controlled

What does a Water Management Plan Based on ASHRAE Standard 188 Actually Look Like



What Are the Elements

ASHRAE Standard 188



FOREWORD -

The purpose of ASHRAE Standard 188 is to establish minimum legionellosis risk management requirements for building water systems.



ANSI/ASHRAE Standard 188-2015

Legionellosis: Risk Management for Building Water Systems

Approved by the ASHRAE Standards Committee on May 27, 2015; by the ASHRAE Board of Directors on June 4, 2015; and by the American National Standards Institute on June 26, 2015.

This Standard is under continuous maintenance by a Standing Standard Project Committee (SSPC) for which the Standards Committee has established a documented program for regular publication of addenda or revisions, including procedures for timely, documented, consensus action on requests for change to any part of the Standard. The change submittal form, instructions, and deadlines may be obtained in electronic form from the ASHRAE website (www.ashrae.org) or in paper form from the Senior Manager of Standards. The latest edition of an ASHRAE Standard may be purchased from the ASHRAE website (www.ashrae.org) or from ASHRAE Customer Service, 1791 Tullie Circle, NE, Atlanta, GA 30329-2305. E-mail: orders@ashrae.org. Fax: 678-539-2129. Telephone: 404-636-8400 (worldwide), or toll free 1-800-527-4723 (for orders in US and Canada). For reprint permission, go to www.ashrae.org/permissions.

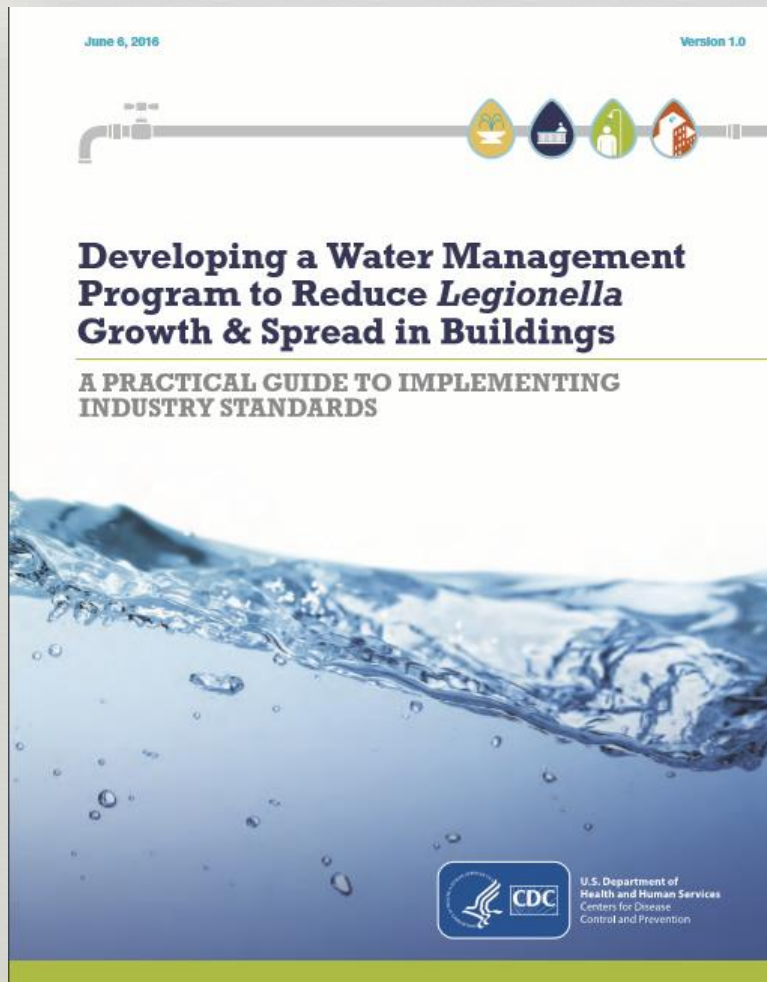
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CDC is Finally Coming to the Table



Forward –
Legionella water management programs are now an industry standard for large buildings in the United States (ASHRAE 188: Legionellosis: Risk Management for Building Water Systems June 26, 2015. ASHRAE: Atlanta).

Risk Assessment & Preliminary Site Assessment



Phase 1

An on-site assessment will be conducted to survey the building water systems and collect site specific information to provide a baseline understanding of risk and support short and long term recommendations.

Risk Assessment & Preliminary Site Assessment



❧ Site Survey

- ❧ • Development of a sampling plan.
- ❧ • Walkthrough of buildings and their water systems.
 - Review of water systems from point of supply to usage.
- ❧ • Collection of water samples for Legionella culture and field measurement of physicochemical parameters (temperature, pH, conductivity, disinfectant)
- ❧ • Create Report

Water Management Plan



Phase 2

A Water Management Plan utilizes an accepted risk management methodology to provide a proactive approach for on-going management of building water systems, while specifically addressing Legionella risk.

The Water Management Plan provides defensible guidance for water system operation, including schedules for on-going monitoring and sampling, documentation and corrective actions, while establishing a means to audit the Water Management Plan.

Elements of Water Management Plan



- ❧ Proactive and documented management of building water systems.
- ❧ • Agreed upon actions for operating goals, system monitoring, documentation, and performing corrective actions if they become necessary.
- ❧ • Demonstrated operational excellence by addressing the new industry standard, ASHRAE 188 Legionellosis: Risk Management for Building Water Systems.

Elements of Water Management Plan



- ❧ : • Identification of Water Safety Team and responsibilities
- ❧ • Facility characterization and process flow diagrams
- ❧ • Legionella hazard analysis
- ❧ • Control limits and operating goals
- ❧ • Monitoring schedule and procedures
- ❧ • Corrective actions
- ❧ • Documentation requirements
- ❧ • Auditing (verification and validation activities)

Thank You

