

Legionella Control

How to Support Your Client in Achieving Legal Compliance

FM Ireland - 8th March 2018

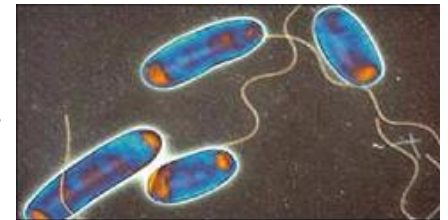
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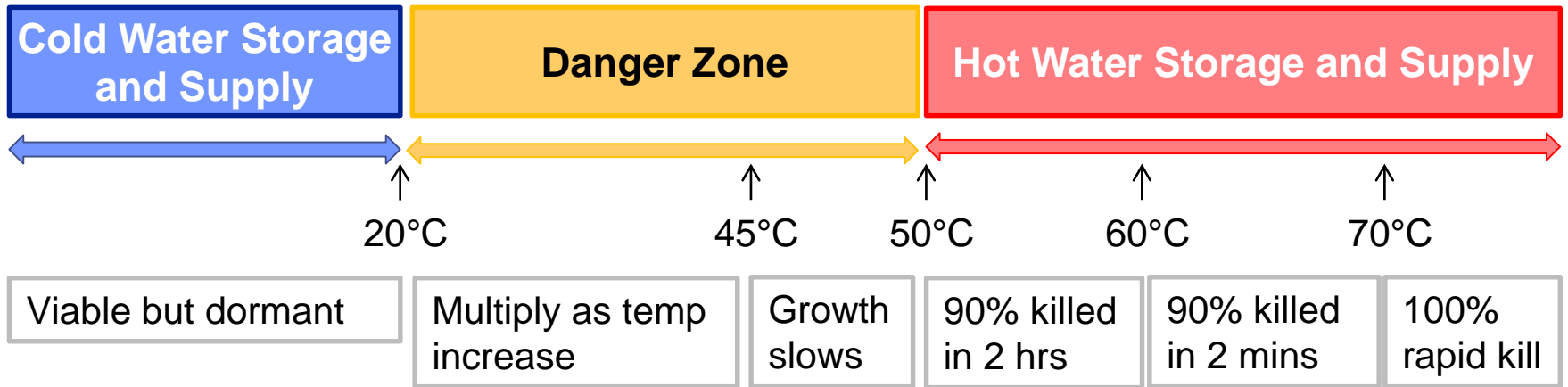
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What is Legionella Bacteria?

- Naturally occurring bacteria
- Nearly 60 different species identified
- Present in the incoming mains cold water
- Requires specific growth conditions



What affects Legionella Bacteria?

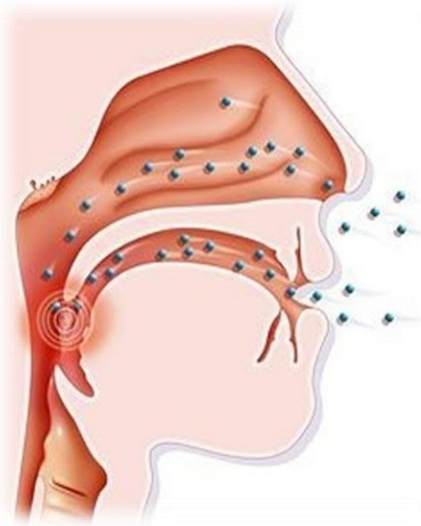


Examples of 'at risk' water systems commonly found in each temperature zone:

<ul style="list-style-type: none">• Incoming Mains Water Supply• Cold Water Storage Tanks• Chilled Water Systems	<ul style="list-style-type: none">• Spa Pools• Cooling Towers• Process Water Systems• Vehicle Wash Systems• Poorly Managed Domestic Systems	<ul style="list-style-type: none">• Hot Water Storage Heaters• Small Local Electric Water Heaters• Process Washers• Closed Heating Systems
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What is Legionellosis?

Legionellosis = Legionnaires' Disease, Pontiac Fever & Lochgoilhead Fever



Legionnaires' Disease

- A form of pneumonia (lung infection)
- Contracted by inhaling infected droplets of water (aerosol)
- Has an incubation period of typically 2-10 days
- Fatality rate typically 10-20%, increasing to 30-40% for healthcare acquired cases
- Diagnosed cases around 10% of actual due to flu-like symptoms

What are Your Clients Legal Obligations?



Safety, Health and Welfare at Work Act 2005 (S.I. No. 10 of 2005)

- Purpose:
 - Sets out the general principles to be adopted at all workplaces to manage risk

- Requirements:
 - ☑ Carry out a written risk assessment
 - ☑ Prepare a safety statement

- Onus on designers, manufacturers, importers or suppliers to:
 - ☑ design and construct equipment so as to be without risk to health when used properly
 - ☑ Provide information on the safe use of equipment

What are Your Clients Legal Obligations?



Safety, Health and Welfare at Work (Biological Agents) Regulations, 1994 as amended in 1998 (S.I. No. 146 of 1994 and S.I. No. 248 of 1998)

- Purpose:
 - Sets out duties of employers to prevent exposure to a biological agent or, if complete prevention is not possible, to minimise exposure
- Requirements:
 - ☑ Carry out a written risk assessment
 - ☑ Identify appropriate control measures
 - ☑ Provide employees with information and training
 - ☑ Avoid or minimise exposure
 - ☑ Use of collective and individual protection measures

What are Your Clients Legal Obligations?



Other Legislation:

- Safety, Health and Welfare at Work (General Application) Regulations 2007 (S.I. No. 299 of 2007)
- Safety, Health and Welfare at Work (Chemical Agents) Regulations, 2001 (S.I. No. 619 of 2001)
- Infectious Diseases Regulations 1981 (S.I. No. 390 of 1981)

Guidelines:

- HSPC National Guidelines for the Control of Legionellosis in Ireland, 2009

Supporting Your Client in Achieving Legal Compliance

The Role of the FM Organisation:

- Dependant on the nature and scope of agreement with the client

Tasks commonly carried out by the FM Organisation:

- ✓ Support the management structure by acting as Responsible Person (RP) or Deputy Responsible Person (DRP)
- ✓ Engage competent service providers on behalf of the RP
- ✓ Source suitable training for the Duty Holder, RP and all necessary operational personnel
- ✓ Support the completion of a Legionella risk assessment
- ✓ Carry out the day to day monitoring and maintenance tasks required by the Legionella risk assessment and Written Control Scheme
- ✓ Maintain records, escalate and resolve non-conforming results
- ✓ Support and provide information for regular Legionella control review meetings

Supporting Your Client in Achieving Legal Compliance

Training and Competence:

Competence - *'sufficient training, experience and knowledge appropriate to the nature of the work to be undertaken'*

- Different roles require different training and competence levels
- Determine the level of training and competence of Service Providers
- Duty Holder, RP, DRP, Site Engineers etc:
 - Legionella awareness and legal requirements
 - Risk assessment and water management general principles
 - Record keeping, data interpretation and reporting
 - Programme monitoring and review and contract management
 - Task specific training e.g. equipment inspection and maintenance, implementing site specific control measures etc

Full training matrix – Table 12 HPSC National Guidelines 2009

Supporting Your Client in Achieving Legal Compliance

Legionella Risk Assessment:

Requirements:

- ✓ Carried out by a competent independent risk assessor
- ✓ Identify and assess the risk of exposure to Legionella bacteria from work activities and water systems
- ✓ Establish any necessary preventive and control measures
- ✓ Provide direction on prioritising the risks
- ✓ Take into account existing control measures
- ✓ Record the significant findings
- ✓ Reviewed annually or when no longer valid



'Failure to undertake a risk assessment or possession of an inadequate risk assessment may lead to prosecution, especially if a system or premises is implicated in a legionnaires' disease outbreak.' HPSC 2009

Supporting Your Client in Achieving Legal Compliance

Implementing Control Programmes:

Control programmes should be:

- Based on the outcome of the risk assessment
- Site and system specific
- Adjusted based on changes to building use
- A combination of physical and chemical controls
- Recorded and records maintained for at least 5 years
- Monitored to ensure non-conformances are escalated and resolved
- Regularly audited by the RP or Competent Person



Supporting Your Client in Achieving Legal Compliance

Implementing Control Programmes:

Tasks commonly carried out by the FM Organisation for Domestic Water Systems:

- ✓ Regular flushing of low use outlets
- ✓ Monthly hot and cold water sentinel temperature checks
- ✓ Monthly hot water heater flow and return temperature checks
- ✓ Regular cold water tank temperature checks and inspections
- ✓ Quarterly shower head and spray outlets clean and descale
- ✓ Mandatory Legionella sampling for all healthcare premises



Tasks commonly carried out by the FM Organisation for Cooling Water Systems:

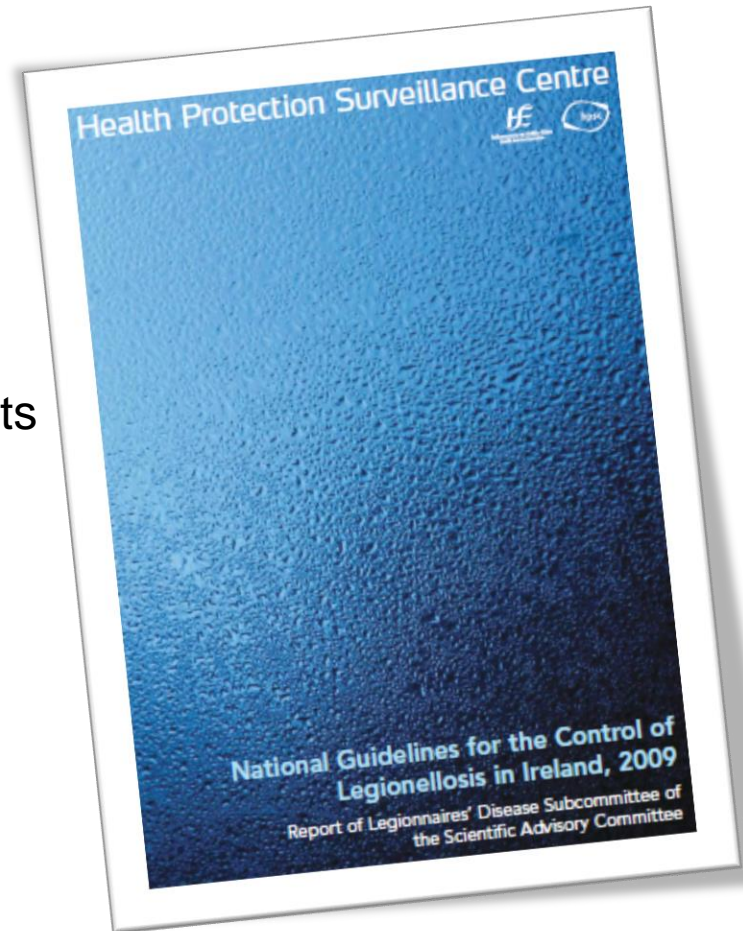
- ✓ Regular chemical dosing checks
- ✓ Regular inspection of drift eliminators and wetted surfaces
- ✓ Regular general bacteria monitoring via dipslide
- ✓ Managing cleaning and disinfections
- ✓ Quarterly Legionella sampling



Take Away: Compliance Checklist

Do you and your client have:

- ✓ Responsibilities allocated
- ✓ Suitable training completed
- ✓ Access to competent help
- ✓ Up-to-date, independent risk assessments
- ✓ Written control scheme implemented
- ✓ Satisfactory closure of non-compliances
- ✓ Emergency action procedures
- ✓ Process of management review
- ✓ Records complete and up-to-date



Questions & Answers



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