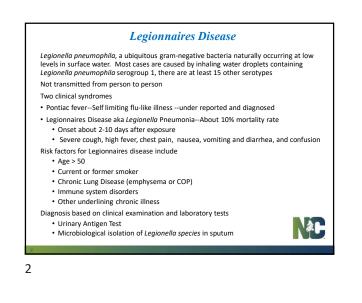


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Legionnaires Disease is Reportable

Reportable disease under § 130A-134 and 10A NCAC 41A .0101 (#36) Communicable Disease Manual- contains instructions for entry into North Carolina Electronic Disease Surveillance System (NCEDS) and to investigate cases

- >90 % of cases are "sporadic" -- no link in time and space with other cases. Two or more cases, especially in health care, or linked in time and space are considered an outbreak and trigger an environmental investigation
- One case in LTC may be considered as "sentinel"

Treatment by antibiotics either quinolones (ciprofloxacin, levofloxacin) and macrolides (azithromycin)

Complexity of the problem

3. Public water supplies -- Opportunities exist for Legionella and other bacteria to colonize and multiply in public water systems- biofilms, corrosion, and low

Greater risk of waterborne bacteria because of complexity of building water systems, fixtures, and equipment

· Proper selection, placement, maintenance, treatment, monitoring, and

8. Ongoing research on causes, prevention and treatment of disease

7. Investigation protocols – currently single sporadic cases outside of health care or other regulated facilities are rarely thoroughly investigated

Alliance to prevent Legionnaires Disease https://preventlegionnaires.org

2. Source water treatment - Safe Drinking Water Act

management of water-based equipment





Lines of prevention include:

disinfectant levels

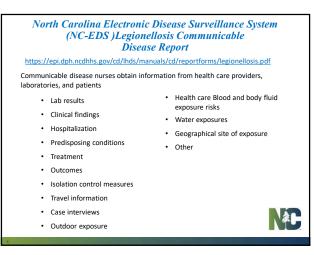
5. Building water systems

4. Residential water systems

6. Water equipment and management

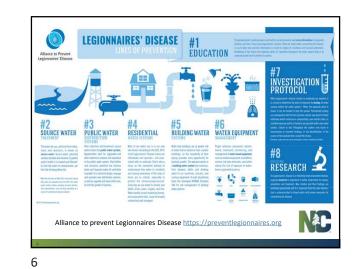
1. Education and awareness

3



4

1



Inside a Professional

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ator (1)

2

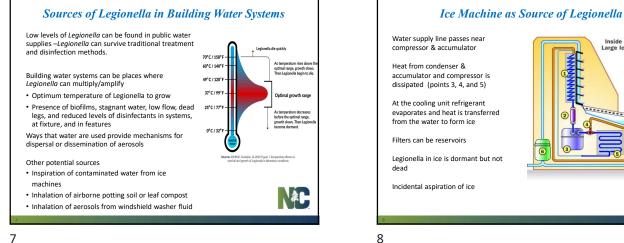
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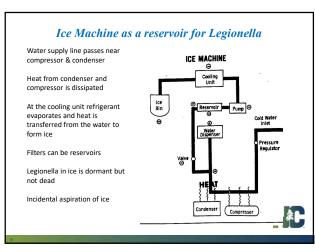
Hot Gas (4)

ump 6

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Condenser (5)





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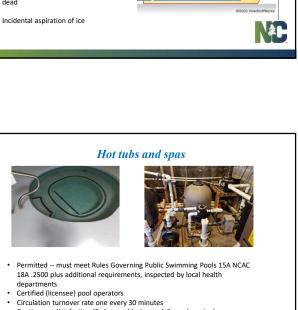
Final report – Legionnaires Disease at Mountain State Fair September 2019 136 cases associated with hot tubs on display

https://epi.dph.ncdhhs.gov/cd/legionellosis/MSFOutbreakReport_FINAL.pdf

https://emergency.cdc.gov/han/han00422.asp Hot Tub Displays and Legionella Risk-Guidance for Environmental and Public Health Practitioners

Increase awareness of event planners and hot tub vendors of hazards and risks of hot tubs at displays

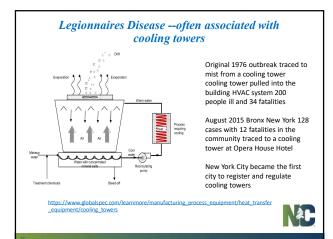
- · Training for operators and vendors
- Maintain free chlorine (2-4 parts per million or ppm) or bromine (4-6 ppm)
- Maintain the pH level of the water at 7.2–7.8.
- · Test pH and disinfectant levels at least twice per day.
- · After display is over cleaning, disinfecting, maintenance, and safe storage of hot tubs



- Continuous disinfection (2-4 ppm chlorine or 4-6ppm bromine) Maintain pH between 7.2–7.8.

Needs routine cleaning, maintenance, monitoring disinfectant levels, filter changes etc.

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Water Management Plans in Buildings

Policies, procedures, and practices that

- Limit the potential for Legionella bacteria and other waterborne pathogens to amplify in building water systems
- Reduce potential for building occupants to be exposed to water containing Legionella bacteria and other waterborne pathogens
- Operate building plumbing systems safely and efficiently

Water Management Plans (WMP) are driven by

- Hazard analysis places where physical, chemical, or microbial conditions exist that may cause harm.
- Risk characterization -- probability and severity of harms from hazards
- Control points --- Places where water enters, is processed, and used and where actions to prevent, eliminate or reduce to hazards to an acceptable level can be applied
- Control limits -- Something that can be monitored at a control point by measurement or observation, based on science, regulation, and best practices --Temperature, pH, residual disinfectant level, and time.



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Why other large buildings need WMP

Government Recommendations -- CDC and other states

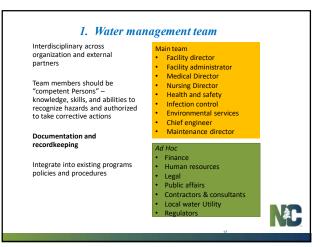
ASHRAE Standard 188 water management plans for all buildings that meet \underline{any} of these criteria

- Multi-housing units with one or more centralized circulating water heaters
- More than ten stories tall
- Intended for housing occupants > 65 years old
- ASHRAE standards are not regulatory unless adopted by an Authority Having Jurisdiction

Costs from outbreaks associated with a facility

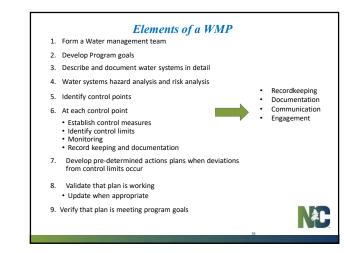
- Disruption of operations, shutdown or equipment, or closure of fixtures and features
- Water use restrictions
- Expensive and difficult to remediate and control hazards
- · Liability and negative publicity
- Investigation of outbreaks by local or state health departments and CDC

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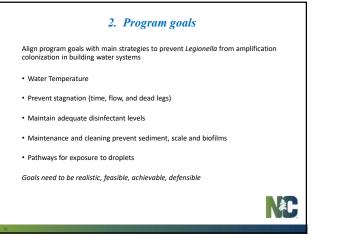


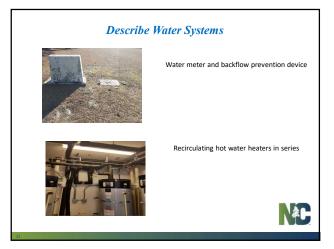
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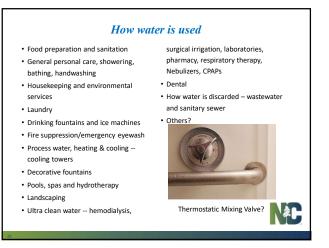


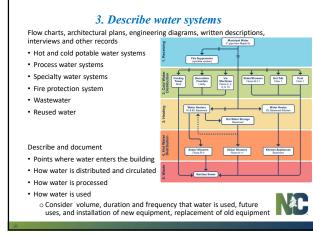




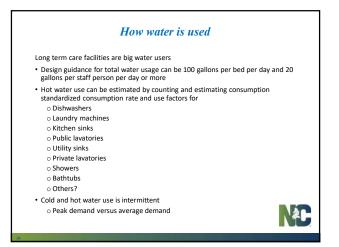




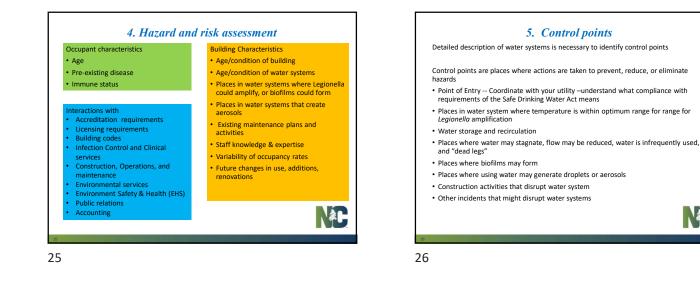








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6. Apply control measures and monitor them

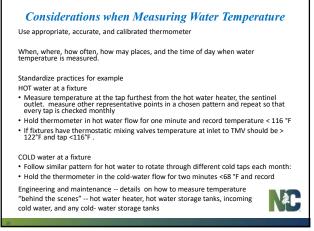
At each control point water management team decides on control methods, control limits, and how they will be monitored.

Control measures are the actions to limit growth and spread of Legionella in the water system

Control Limits are range acceptable values or conditions at each control point

- · Quantitative or qualitative
- · Measurable or observable
- Water Management Plan should describe in detail when, where, and how control limits will be monitored with standardized practices and procedures
- If services are contracted hold contractors accountable
- · Follow Cooling Technology Institute guidance for operations and maintenance

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Monitoring – Quantitative Measurements of temperature, pH, residual disinfectant, water pressure and

Hot water systems >140°F in storage tanks and >124°F in distribution

Temperature limits at point of use (100 to 116°F) for lavatories and

- Safe Drinking Water Act disinfectants in drinking water at 0.2 mg/l and maximum of 2 mg/l $% \left(1-\frac{1}{2}\right) =0$

Residual disinfectant levels decrease with "age" of water and as temperature of water increases –for hot water, temperature is the major control strategy

• Cold water systems < 68°F minimum to extent practicable

other water quality indicators

piping

 pH between 6.5 and 8.5 Residual disinfectant levels

bathing facilities

Temperature

- Notification process for intended/unintended disruption of water supply
- Determine monitoring frequency based on hazards, risks, costs of equipment and supplies, staff training, staff time recordkeeping, and documentation

Labels, record keeping, and documentation

- Keep water networks, systems, components, equipment labelled in a clear and uniform manner
- Set up and use a record keeping system for inspections, as-needed and preventive maintenance, repairs, and when corrective actions are implemented
- Keep previous versions of water management plans as new plans are updated
- Keep water management team meeting minutes
- Training for workers implementing the plan involve workers in quality improvement and verification
- Storage, handling, and use of cleaning chemicals and process chemicals



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7. Predetermined actions when deviations from control limits occur

Tie into facility emergency water plan

Cleaning, disinfection, and flushing

Water use restrictions, shut down equipment or close facilities

Point of use filtration with 0.2 μ filters • Install on showers and faucets--consider when other methods are not feasible and/or for high-risk patients

Professional Remediation

- Thermal shock treatment-- > 160° F in tank and flush each outlet for at least 30 minutes. Hot water > 140°F for at least 30 minutes at each outlet
- Shock disinfection increase residual chlorine to >2 mg/liter at all outlets and maintain throughout the system by continuous flushing for at least two hours
- In extreme situations implement system-wide treatment and disinfection • Facility must meet requirements for Non-transient, Non-Community Public Water System

https://www.cdc.gov/healthywater/emergency/pdf/emergency-water-supplyplanning-guide-2019-508.pdf



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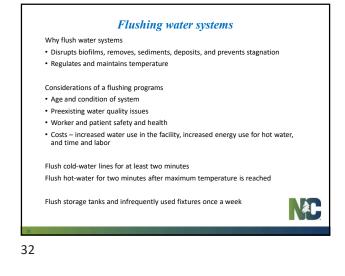
9. Validation

- Is the program meeting the goals?
 Is sampling for Legionella required for
- Is sampling for Legionella required for validation? • Maybe – routine environmental sampling for Legionella or other waterborne pathogens should only be performed as part of the water management

program. Sampling for Legionella

- Sampling and testing is one way to validate effective water management plans
- A decision by the water management team to routinely sample for *Legionella* for validation should be careful and deliberate
- Keep records and documentation
 Do not sample to "see what we have" or conduct unplanned, unsystematic or undirected sampling
- If routine sampling is part of the plan:
- Go All out !!!Nonrandom, part of a carefully designed
- sampling plan

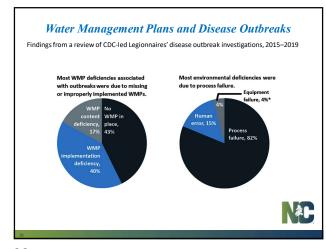
 Set pre-determined thresholds to
- interpret resultsSet pre-determined threshold limits to implement corrective actions
- Devote enough resources
- Work out technical concerns
- Select appropriate laboratories



8. Verification

Is Water Management Plan working as designed and intended?

- Recordkeeping and documentation
- Track incidents when deviations from control limits occur
- Investigations and after-action reviews to reduce number and severity of incidents when deviations control limits occur, or corrective actions occur
- Document costs for monitoring
- Document costs for monitoring
- Document costs for interventions when deviations from control limits occur
 Engage people implementing the program
- Are elements of water management program feasible given available resources and workflow
- Ask if resources, time, tools and equipment, training are adequate to meet
- program needs and provide addition resources as needed • Ask for recommendations to make changes to practices and procedures that improve worker safety and efficiency



Environmental Sampling Potential sampling sites Point of entry Whirlpools Holding tanks · Cooling towers Centralized hot water heaters supply & • Decorative fountains returns At distal ends of hot and cold-water systems Expansion tanks Before and after filters or water softeners Ice machines Dead legs Showers Fixtures used infrequently

- Faucets

Measure temperature, pH, and residual disinfectants wherever samples are collected

Molecular tests (PCR) and antibody assays can be used for verification in the absence of outbreaks or sentinel cases

In outbreaks and sentinel case investigations --Follow CDC guidance for Sampling Procedure and Potential Sampling Sites https://www.cdc.gov/Legionella/downloads/cdc-sampling-procedure.pdf 1 liter water samples and biofilm samples with culture-based analysis by CDC ELITE laboratory is the 'gold standard''

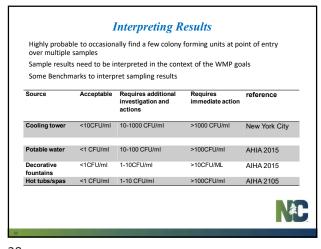
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Final Remarks

- Time, energy, resources, and management commitment are needed to an effective water management plan.
- Complete elimination at all times of Legionella from a water system is not a realistic goal
- · Facilities depend on their PWS to deliver high quality water with adequate residual disinfectants
- · Facilities depend on water temperature, maintenance, cleaning, and preventing stagnation (time, flow, and dead legs) as main control methods
- There will be places in every water system within the optimum temperature range for Legionella to grow and amplify
- In the absence of cases linked to the facility CMS expects that healthcare facilities have established a WMP Team and gone through the steps to implement a plan. CMS does not require sampling
- A verified WMP allows enables informed decisions to reduce hazards, risks, optimize costs, and improve efficiency



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