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PREFACE

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Risk Assessment Consultant: Mr Chris Wilson MWM Society

Date of Assessment: 3rd June 2010

Date of Review: June 2012

INTRODUCTION

This report relates to a water source Risk Assessment carried out by Mr Chris Wilson of Freeston Water Treatment Ltd on the 3rd June 2010 on behalf of Hampshire County Council. The survey was carried out at Baycroft School, Gosport Road, Stubbington, Hampshire PO14 2AE. During the course of the survey water systems within the properties were risk assessed. These sources were chosen as being fully representative of the overall domestic water systems and outlets within the buildings.

The survey and Risk Assessment were undertaken in order to comply with the Health and Safety Executive requirements on the control and prevention of Legionellosis. The Risk Assessment has been carried out in accordance with ACoP L8 - The control of Legionella bacteria in water systems (Approved Code of Practice and Guidance).

The survey has been limited to the terms of reference agreed between Hampshire County Council and Freeston Water Treatment Ltd. Observations relating to system conditions and other factors applicable to the requirements of L8 have been recorded during the survey and specific references are made to compliance with these documents in the Observations section of the report.

A Summary of Recommendations concludes the report. ACoP L8 places responsibility on employers and others to prepare a scheme for preventing or controlling the risk from Legionellosis. Adoption of a monitoring scheme in conjunction with a regime of preventative maintenance and associated record keeping will meet these requirements.

BACKGROUND TO LEGIONELLA

Legionella is the bacterium that causes Legionnaires disease. Of this bacterium, Legionella pneumophila is the species most commonly associated with disease outbreaks. Legionnaire's disease is identified as a pneumonia type of infection of the lower respiratory tract. The infection is most commonly acquired by the inhalation of airborne droplets or particles containing viable Legionella. Exposure to Legionella can also cause a short feverish illness without pneumonia known as Pontiac Fever.

Research indicates that Legionella can occur in hot and cold water services.

Sediment, scale, and organic materials present in water systems, can provide nutrients and give protection for Legionella. Legionella has been shown to colonise certain types of water fittings, pipe work and materials used in the construction of water systems.

The formation of bio films within water systems is undesirable and may also provide harbourage and favourable conditions for Legionella growth. Legionella is most likely to proliferate in water systems that have a temperature between 20°C and 50°C. Human blood temperature of approximately 37°C is the most ideal temperature for proliferation. Stagnant water within the above temperature range appears to provide the ideal conditions for proliferation of Legionella.

Once a risk has been identified and assessed, a scheme should be prepared for preventing or controlling it. The risk is heightened when conditions are not monitored and control of the system is lost, thereby allowing Legionella to proliferate.

Legionella will survive at temperatures below 20°C but is considered to be in a dormant state with no growth activity. The bacterium does not survive temperatures maintained consistently at 60°C or above.

ASSESSMENT OF RISK

The Legionella risk

Legionnaire's disease is most commonly caused by the inhalation of water droplets contaminated with the Legionella bacteria. It is therefore important that systems susceptible to colonisation by Legionella and which incorporate a potential means for creating and disseminating water droplets should be identified and the risk they present assessed.

The assessment must be completed for routine system operation and also for circumstances such as breakdown, abnormal operation, commissioning or other unusual circumstances.

Risk assessment categories:-

- A) The potential for the formation of droplets.
- B) The condition of the water.
- C) Water temperature.
- D) The water turnover rate.
- E) The susceptibility of persons exposed to droplets.
- F) The population density exposed to droplets.

In undertaking the Risk Assessment and drawing up precautions, particular attention must be paid to situations where the population exposed contains a relatively high number of people susceptible to Legionella, due to their age and in many cases poor health.

Risk Assessment Review

The Risk Assessment should be reviewed every 2 years as stated in the HSE's ACoP L8 or otherwise for any of the reasons below:-

- 1) Changes are made to plant or water systems or its use.
- 2) Changes are made to building use in which the water system is installed.
- 3) New information about risks or control measures becomes available.
- 4) Results of checks indicate that control measures are no longer effective.

OBSERVATIONS

General and specific observations on the systems made during the course of the survey are recorded and the more general requirements of L8 are commented where applicable, although references are made to compliance with the requirements of L8.

Compliance with ACoP L8 may be classified into two distinct categories:

- a) Management Procedures - The management procedures, which have been implemented, to ensure that all control measures, record keeping and monitoring are adequate and effective.
- b) Systems Conditions - The physical conditions of the water systems in the building must be considered when assessing the risk from Legionellosis.

This report therefore addresses the above categories. A general overview of existing Management Procedures is included and followed by comprehensive observations of the Systems Conditions as seen during the course of the survey.

General Management Compliance

ACoP L8 para 23 - Identify Sources of Risk

Observations

The assessments are detailed in the relevant section of this report.

General Management Compliance

ACoP L8 para's 39, 53 and 66 - Prepare a Scheme for Preventing or Controlling the Risk - Implement and Manage Precautions - Maintain Records

Observations

A regime of repair and breakdown maintenance should be implemented for the buildings at Baycroft School for all of the water services and systems. Procedures and records for the various maintenance activities must be documented and the Written Scheme recommendations be implemented in order to control Legionellosis. The precautions taken must be documented within an operational logbook.

Further Action Required

A Logbook should be prepared and records kept within it, as outlined in our recommendations.

The logbook, documentation and operation should be audited on a periodic basis in order to ensure that the system conditions and precautionary procedures are being carried out satisfactorily.

The precise procedures relating to the precautionary measures, i.e. cleaning of water cistern systems and calorifiers together with start up and shut down procedures for calorifiers, should be maintained within the logbook system and updated as required. The details of persons who are trained and competent to undertake the works should also be recorded in the logbook along with details of the training undertaken. This also applies to specialist contractors who may undertake part of these duties.

The Risk Assessment report relates to observations made and information supplied at the time of the survey. Every effort has been made to examine as much of the water system as possible although some areas, such as pipe work beneath floors or behind walls would not have been inspected due to restricted access.

SITE SURVEY

A responsible person should be appointed to take day-to-day responsibility for the Written Scheme.

If the assessment shows that there is a reasonably foreseeable risk and it is reasonably practicable to prevent exposure or control the risk from exposure, the person on whom the statutory duty falls (see paragraph 23) should appoint a person or persons to take managerial responsibility and to provide supervision for the implementation of precautions. (Paragraph 39 HSE's ACoP L8)

It appears that there is no dedicated water systems logbook in place or monthly temperature monitoring of the hot and cold outlets or calorifier being carried out. I would recommend a logbook be produced along with a written scheme and temperature monitoring be commenced as soon as is practicable.

System Reference	Baycroft School
Location	Site Buildings
Method	Visual Assessment and Temperature Profiling

HOT WATER STORAGE

Hot water storage at Baycroft School is by one calorifier located within the main boiler room and supplies all the hot water to the main building with the exception of Room 5 and the Prep Room which both have local electric water heaters. The calorifier was manufactured by the AO Smith Products Company and is gas fired. It has fibre type insulation under a metal outer casing. There is a return system fitted to the calorifier that has a circulating pump which at the time of the survey appeared to be working correctly. The calorifier is fed from the cold water storage cisterns also located on the roof of the main building. I would recommend that the calorifier be purged to drain to check the water quality on at least a six monthly period and recorded within a water systems logbook when carried out. I was informed that it is unknown if this is being carried out as the calorifier was commissioned approximately six months ago. There is a temperature gauge on the hot flow pipe but not on the hot return pipe work. I would recommend that a temperature gauge is fitted to the return pipework for monthly temperature monitoring to be carried out.

L8 recommends that the calorifier is checked internally for scale and sludge on an annual basis. I was informed that it is unknown if this is being carried out as the calorifier was commissioned approximately six months ago.

L8 recommends hot water storage to be 60.0°C and the return to be maintained at 50.0°C at all times.

The temperature of the stored water within the calorifier at the time of the survey was:-

Calorifier	Storage	63.0°C	Satisfactory
Calorifier	Return	60.4°C	Satisfactory

PHOTOGRAPHS

The hot water calorifier located within the plant room.



COLD WATER STORAGE

Domestic cold water storage at Baycroft School consists of two domestic cold water storage cisterns located on the roof of the main building. Domestic cold water storage Cistern No. 1 is nearest to the door and is of a galvanised steel construction with fibre sheet insulation to the body and lid. There is no vent on the lid and I would recommend that a WRAS (Water Regulations Advisory Scheme) screened vent is fitted. There is no screen fitted to the overflow and I would recommend that WRAS approved items are fitted.

As this vessel is above 1000 litre capacity it should be fitted with an overflow warning pipe with a WRAS approved screen, I would recommend that this be fitted. There is a returning vent pipe into the lid of the cistern and I would recommend that this be removed and piped to a foul drain via an air gap and the aperture in the lid be sealed with a WRAS approved material. There is a satisfactory cross flow of water through the cistern.

The inside of the cistern showed a heavy deposit of sediment on the base, a heavy amount of biofilm on the sides and was heavily corroded. Sediment, corrosion and biofilm act as nutrients and ideal environments for the proliferation of bacteria including Legionella. It was not known when the cistern was last cleaned and disinfected. I would recommend that the cistern be cleaned, treated with a WRAS approved coating and disinfected as soon as is practicable.

The cold water storage temperature of Cistern No. 1 was:-

14.7°C Satisfactory

WATER STORAGE CISTERN SURVEY

Cistern Location/ No.	Roof-Nearest to the Door/Cistern No. 1
Materials of Construction	Galvanised steel
Cistern Dimensions	1.9mtr x 1.3mtr x 1.2mtr Approximately
Lid Condition / vent fitted	Satisfactory / Not Fitted
Cistern Insulation	Satisfactory
Overflow Pipe/Insect Screen	Yes/No
Overflow Warning Pipe/Insect Screen	No/No
Isolation Valves Fitted Inlet /Outlets	Yes/Yes
Cross Flow of Water	Satisfactory
Internal Condition of Cistern	Heavy sediment, heavy biofilm and heavy corrosion
Water Temperature	14.7°C Satisfactory
Cistern linked/Single	Single
Drain Fitted	No
Any Returning Vent Pipes	One
Notes	<p>Clean, treat with a WRAS approved coating and disinfect as soon as is practicable and repeat disinfection annually if deemed necessary.</p> <p>Fit WRAS approved screened lid vent.</p> <p>Fit overflow warning pipe.</p> <p>Fit WRAS approved screens to the overflow and overflow warning pipes.</p> <p>Remove the returning vent pipe and re-route to a foul drain via an air gap. Cover the hole in the lid with a WRAS approved material.</p>

The maximum allowed water temperature is 20°C as outlined in L8.

Domestic cold water storage Cistern No. 2 is furthest from the door and is of a galvanised steel construction with fibre sheet insulation to the body and lid. There is no vent on the lid and I would recommend that a WRAS (Water Regulations Advisory Scheme) screened vent is fitted. There is no screen fitted to the overflow and I would recommend that WRAS approved items are fitted.

As this vessel is above 1000 litre capacity it should be fitted with an overflow warning pipe with a WRAS approved screen, I would recommend that this be fitted. There is a satisfactory cross flow of water through the cistern. The inside of the cistern showed a heavy deposit of sediment on the base, a heavy amount of biofilm on the sides and was heavily corroded. Sediment, corrosion and biofilm act as nutrients and ideal environments for the proliferation of bacteria including Legionella.

It was not known when the cistern was last cleaned and disinfected. I would recommend that the cistern be cleaned and treated with a WRAS approved coating and disinfected as soon as is practicable.

The cold water storage temperature of Cistern No. 2 was:-

16.6°C Satisfactory

WATER STORAGE CISTERN SURVEY

Cistern Location/ No.	Roof-furthest from the door/Cistern No. 2
Materials of Construction	Galvanised steel
Cistern Dimensions	1.9mtr x 1.3mtr x 1.2mtr Approximately
Lid Condition / vent fitted	Satisfactory/ Not Fitted
Cistern Insulation	Satisfactory
Overflow Pipe/Insect Screen	Yes/No
Overflow Warning Pipe/Insect Screen	No/No
Isolation Valves Fitted Inlet /Outlets	Yes/Yes
Cross Flow of Water	Satisfactory
Internal Condition of Cistern	Heavy sediment, heavy biofilm and heavy corrosion
Water Temperature	16.6°C Satisfactory
Cistern linked/Single	Single
Drain Fitted	No
Any Returning Vent Pipes	No
Notes	<p>Clean and treat with a WRAS approved coating and disinfect as soon as is practicable. Repeat disinfection annually if deemed necessary.</p> <p>Fit WRAS approved screened lid vent.</p> <p>Fit overflow warning pipe.</p> <p>Fit WRAS approved screens to the overflow and overflow warning pipes.</p>

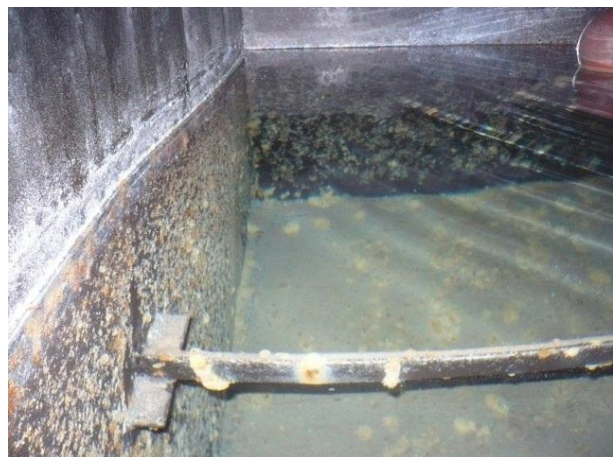
The maximum allowed water temperature is 20°C as outlined in L8.

PHOTOGRAPHS

External view of the domestic cold water storage cisterns.



An internal view of the domestic cold water storage Cistern No 1.



An internal view of the domestic cold water storage Cistern No. 2.



DOMESTIC WATER DISTRIBUTION

Domestic water services should operate at temperatures that prevent the proliferation of Legionella. L8 specifies that hot water should be stored at no less than 60°C and distributed at no less than 50°C, obtainable at user outlets within one minute of opening. Cold water should be stored and distributed at no more than 20°C.

Domestic hot water within Baycroft School distributes from one gas fired calorifier located within the main boiler room and supplies all the hot water to the main building with the exception of Room 5 and the Prep Room which both have local electric water heaters. The Annexe and Fay House both have their own mains cold water fed combi boilers which supply all the hot outlets.

Domestic cold water within Baycroft School is supplied by one cold water storage cistern located on the roof of the main building. It supplies the calorifier and various outlets within the main school building, as shown on the schematic drawings.

Mains cold water within Baycroft School supplies the domestic cold water storage cistern, the main school heating boilers, and most of the outlets within the main building as shown on the schematic drawings. Mains cold water supplies all the outlets and the combi boilers in the Annexe and Fay House.

In all areas of distribution and use, inspection, test and measurement was undertaken at representative positions in order to evaluate conditions and areas of potential risk.

At the time of the survey (within one minute) these hot water outlets within the buildings were recorded as follows:-

Baycroft School	
Hot Water Outlet Temperatures	
Fay House Ground Floor Kitchen Sink	42.5°C Inlet to TMV Not Satisfactory 40.7°C TMV Outlet Satisfactory
The Annexe Cleaners Room Sink	57.2°C Satisfactory
Main Building First Floor Room 17 Sink	62.9°C Satisfactory
Main Building Ground Floor Room 11 Sink	60.6°C Inlet to TMV Satisfactory 38.0°C TMV Outlet Satisfactory
Main Building Ground Floor Main Kitchen Sink	65.1°C Satisfactory
Main Building Ground Floor Prep Room Sink	59.3°C Inlet to TMV Satisfactory 46.1°C TMV Outlet Not Satisfactory
Main Building Ground Floor Staff Male Toilets Wash Basin	62.9°C Inlet to TMV Satisfactory 38.2°C TMV Outlet Satisfactory

L8 recommends that the hot water should achieve 50°C, obtainable at user outlets within one minute of opening.

TMV's (Thermostatic Mixing Valves) are fitted to ensure that the water temperature at hot water outlets does not exceed 43°C and scald users.

The hot water supplying the TMV's should be 50°C at the TMV inlet as recommended in L8.

At the time of the survey (within two minutes) the cold water outlets within the buildings were as follows:

Baycroft School	
Cold Water Outlet Temperatures	
Fay House Ground Floor Kitchen Sink	13.8°C Satisfactory
The Annexe Cleaners Room Sink	14.7°C Satisfactory
Main Building First Floor Room 17 Sink	16.0°C Satisfactory
Main Building Ground Floor Room 11 Sink	15.4°C Satisfactory
Main Building Ground Floor Main Kitchen Sink	15.2°C Satisfactory
Main Building Ground Floor Prep Room Sink	21.5°C Not Satisfactory
Main Building Ground Floor Staff Male Toilets Wash Basin	14.5°C Satisfactory

L8 recommends cold water should be stored and distributed at no more than 20°C.

GENERAL

- Thermostatic Mixing Valves (TMV's) are fitted in many areas of Baycroft School; these valves should be serviced and maintained to the manufacturers recommendations. I was informed that this is not carried out.
- Infrequently used outlets are ideal areas for the proliferation of bacteria. Areas where the outlets are not used at least on a weekly basis should be removed or put on a weekly flushing regime (without creating an aerosol) and recorded. I was informed that all outlets (including outside taps) are used everyday all year except for school holiday. Flushing is currently only being done at the end of the school holidays and I would recommend that it is carried out weekly when the school is closed.
- Dead leg pipework are ideal areas for the proliferation of bacteria and should be removed or put on a twice weekly flushing regime (without creating an aerosol) and recorded.

Dead legs were found on the roof, on the mains pipe that used to connect to the now redundant heating boilers F&E tank.

- The shower head and hose must be cleaned and disinfected quarterly and recorded when carried out as recommended in L8. This appears to be carried out erratically at present and should be actioned as stated above.
- It is unknown when Legionella or bacteriological samples were last taken and I would recommend that this is carried out if temperatures fall outside of the limits as detailed in L8.

- Monthly temperature monitoring of the calorifier and hot and cold outlets is not being carried out and I would recommend that this is commenced as soon as is practicable.
- Some of the cold outlets have elevated cold water temperatures and I would recommend that all hot and cold domestic pipework is adequately insulated against heat loss / gain.
- There is an inline scale reducing unit on the calorifier and this should be cleaned / replaced inline with the manufacturer's recommendations. It is unknown if this is being carried out.

RECORDS

It is recommended that a water quality log book be produced for the site to include records of weekly, monthly, quarterly, six monthly and annual procedures. These should be carried out as recommended in this Risk Assessment.

Details of the responsibilities they hold should be included together with items listed as follows:

Maintenance carried out on water systems

Cleaning and chlorination of water cisterns

Inspection of water storage cisterns

Monthly temperature monitoring

Flushing of infrequently used outlets

Annual inspections of the calorifier

Purging of the calorifier

Faults and defects to be recorded

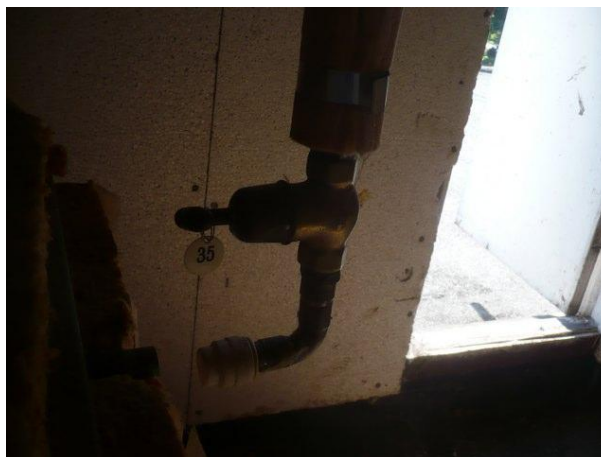
Audit sheet for inspections of the logbook and dated when completed

All of the above should be included in the water systems logbook and signed for when completed.

ADDITIONAL PHOTOGRAPHS

Roof

Dead leg on mains cold water pipe.

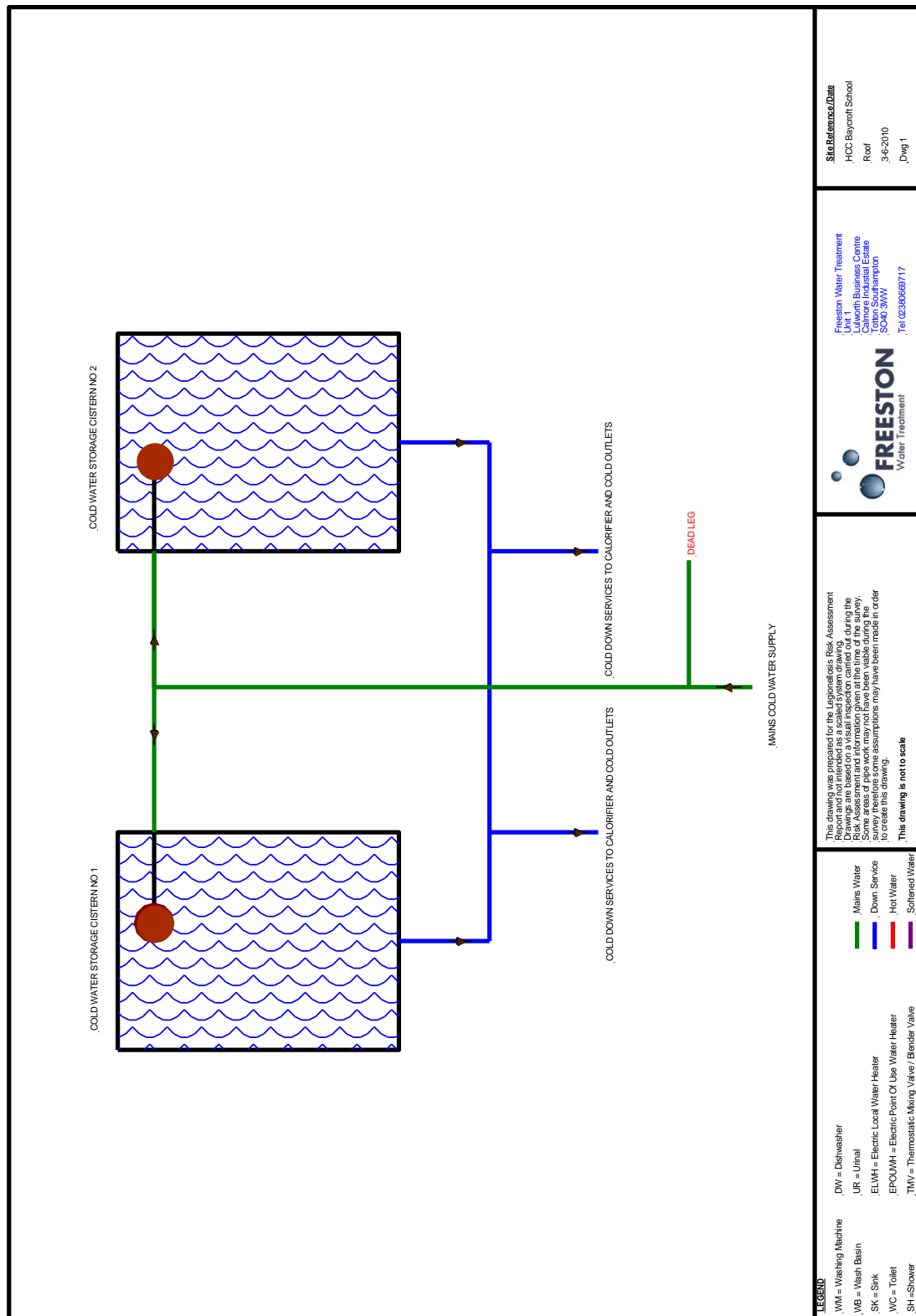


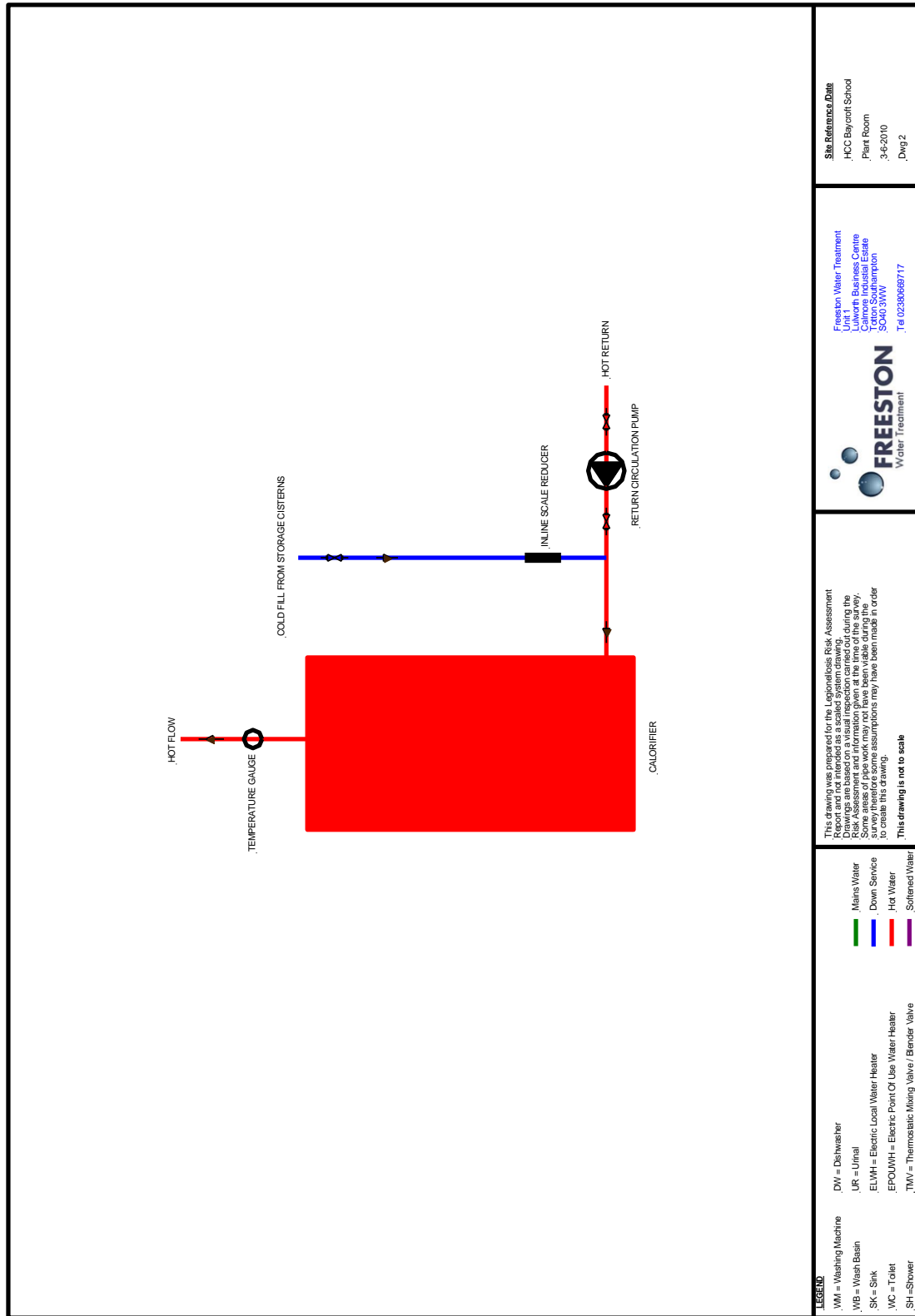
Plant Room

Scale reducing unit



DRAWINGS





LEGEND

- .MM = Washing Machine
- .WB = Wash Basin
- .SK = Sink
- .TC = Toilet
- .SH = Shower
- .DW = Dishwasher
- .UR = Urinal
- .ELWH = Electric Local Water Heater
- .EPOUWH = Electric Point Of Use Water Heater
- .TMV = Thermosatic Mixing Valve / Barndor Valve

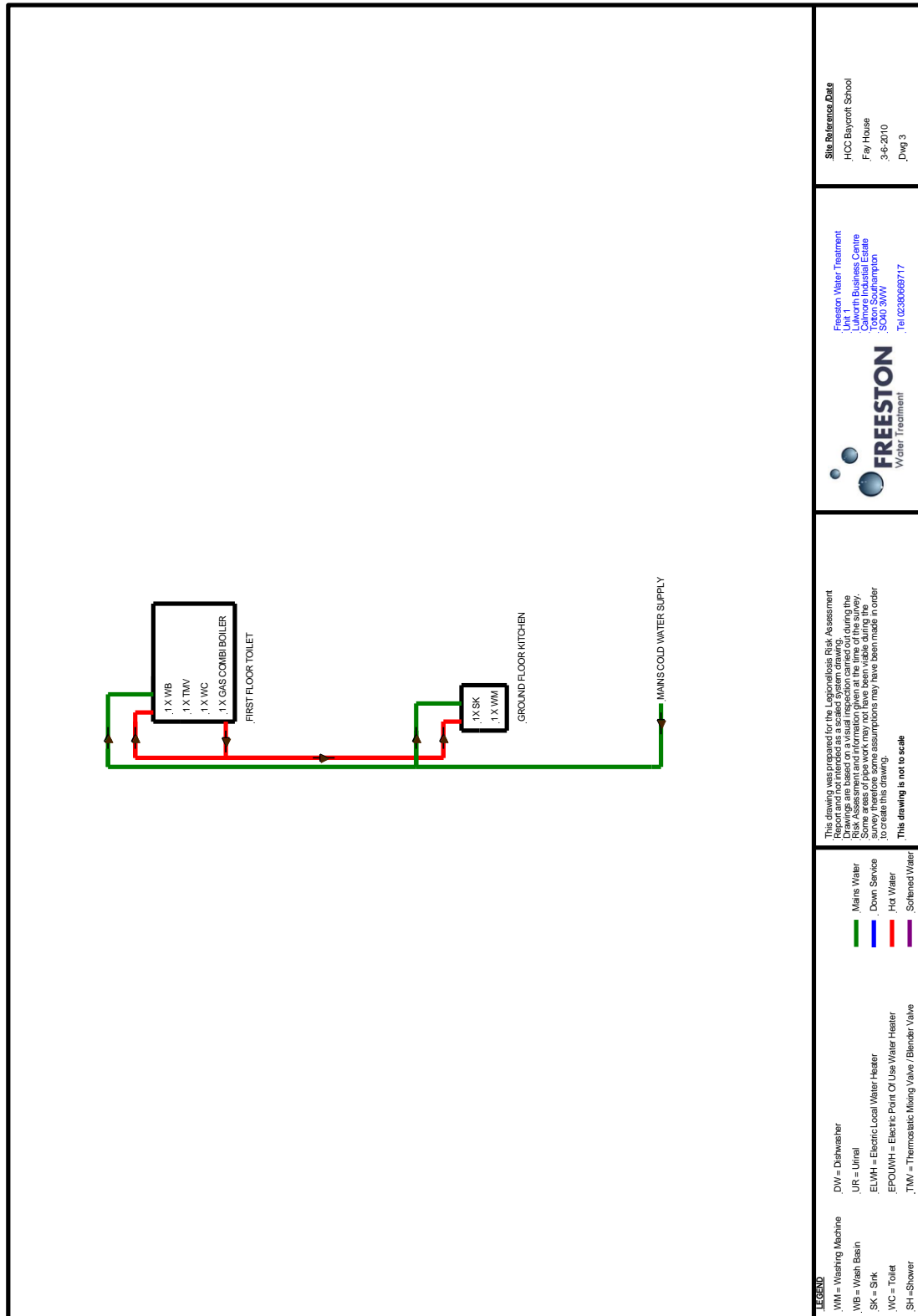
- Mains Water
- Down Service
- Hot Water
- Softened Water

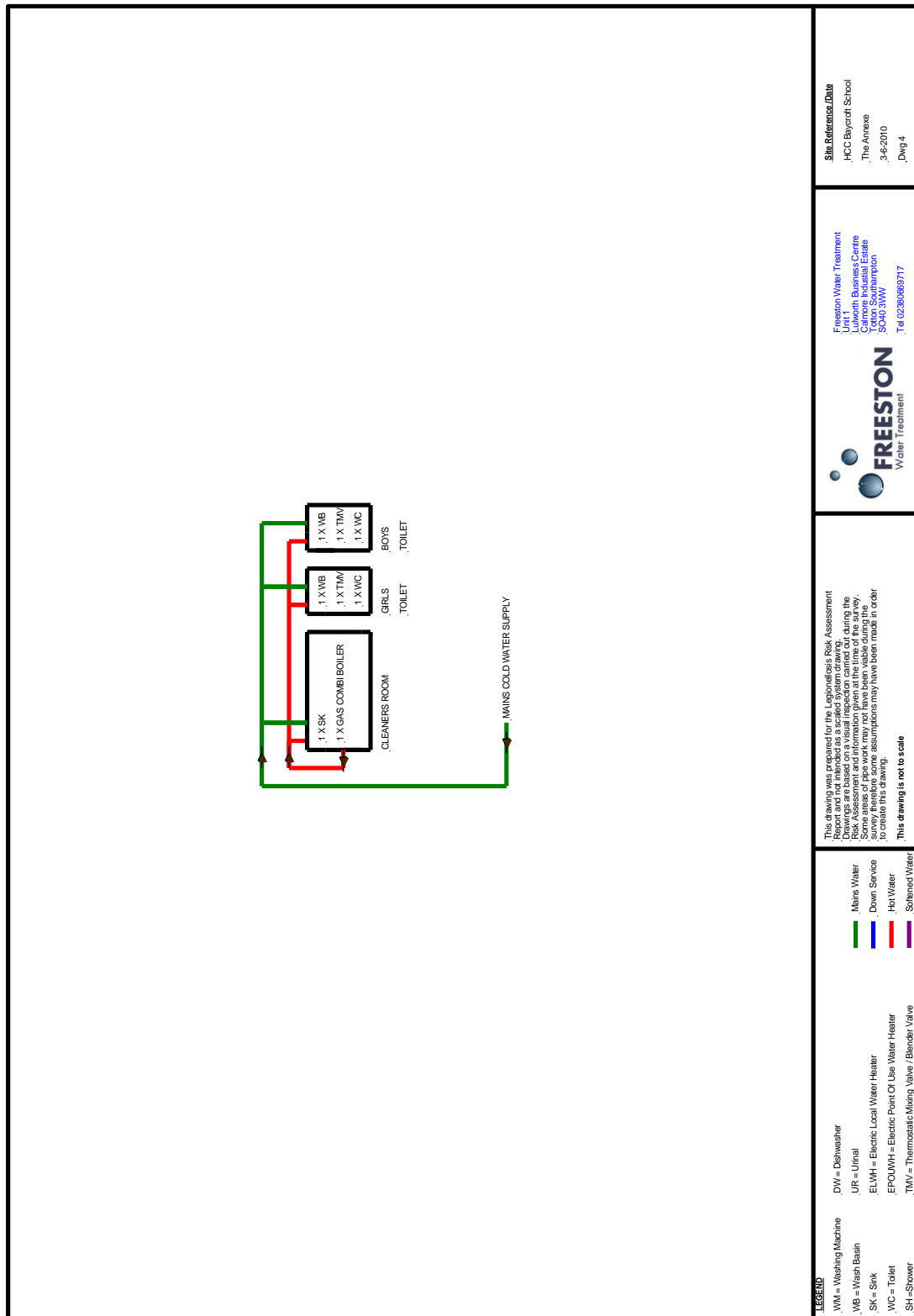
This drawing was prepared for the Legionellosis Risk Assessment. It is based on the information provided during the survey. Some areas of pipe work may not have been visible during the survey. Assumptions may have been made in order to create this drawing.
 This drawing is not to scale

FRESTON
 Water Treatment

Freeston Water Treatment
 Unit 1
 Lutworth Business Centre
 Carnons Industrial Estate
 Carnons, Southampton
 SO40 3WV
 Tel: 02380669717

Site Reference/Date
 .HCC Baycroft School
 .Plant Room
 .3-6-2010
 .Dwg 2





Site Reference/Date
 HCC Baycroft School
 The Annex
 -6-2010
 ,Dwg 4

Freston Water Treatment
 Unit 11
 Calmore Industrial Estate
 Sector Southampton
 SO40 3HW
 Tel: 0238066717

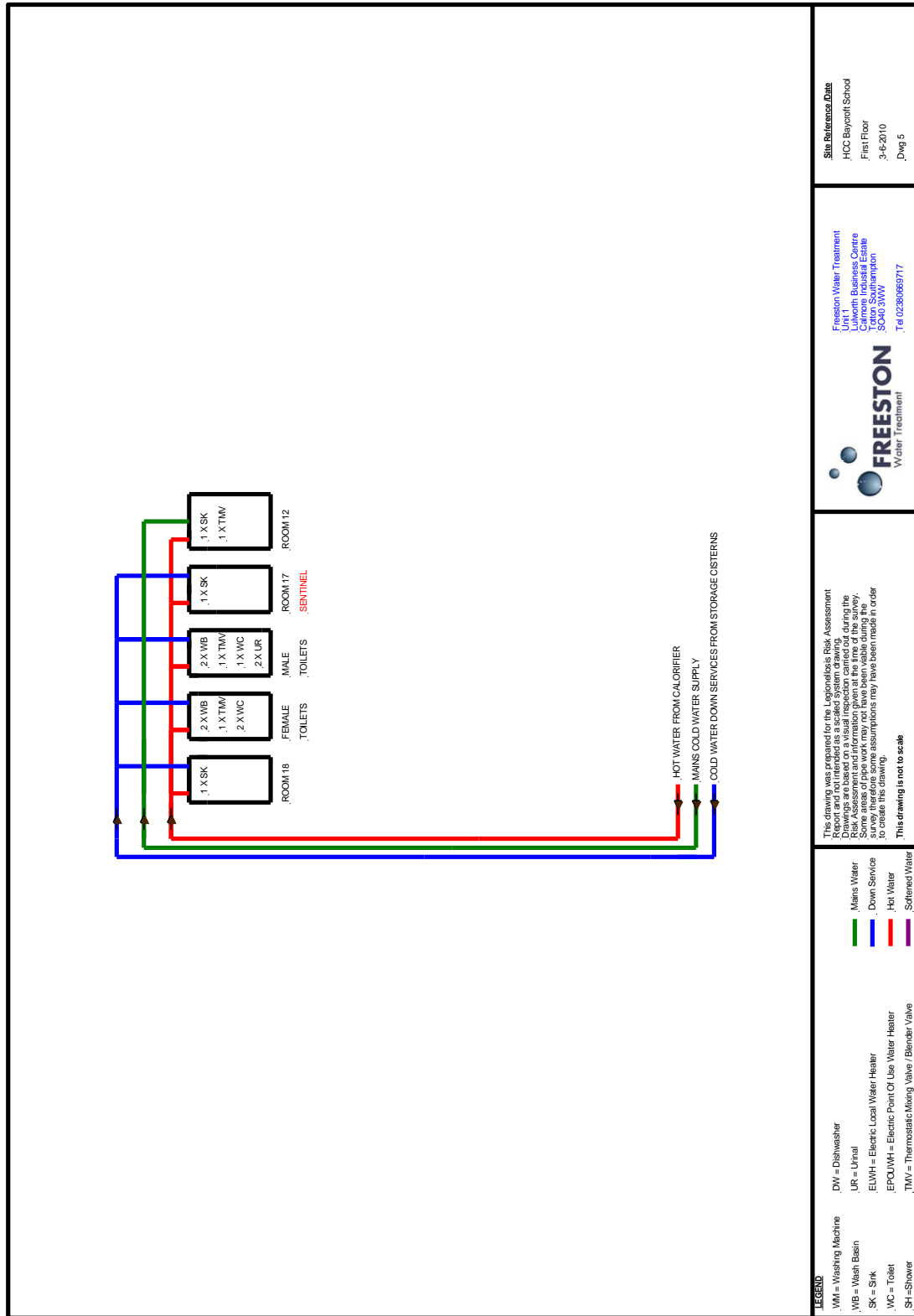


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Mains Water
 Down Service
 Hot Water
 Softened Water

DW = Dishwasher
 UR = Urinal
 ELWH = Electric Local Water Heater
 EPOUWH = Electric Point Of Use Water Heater
 TMV = Thermostatic Mixing Valve / Blender Valve

WM = Washing Machine
 WB = Wash Basin
 SK = Sink
 WC = Toilet
 SH = Shower



Site Reference: Date
 HCC Baycroft School
 First Floor
 3-6-2010
 Dwg 5

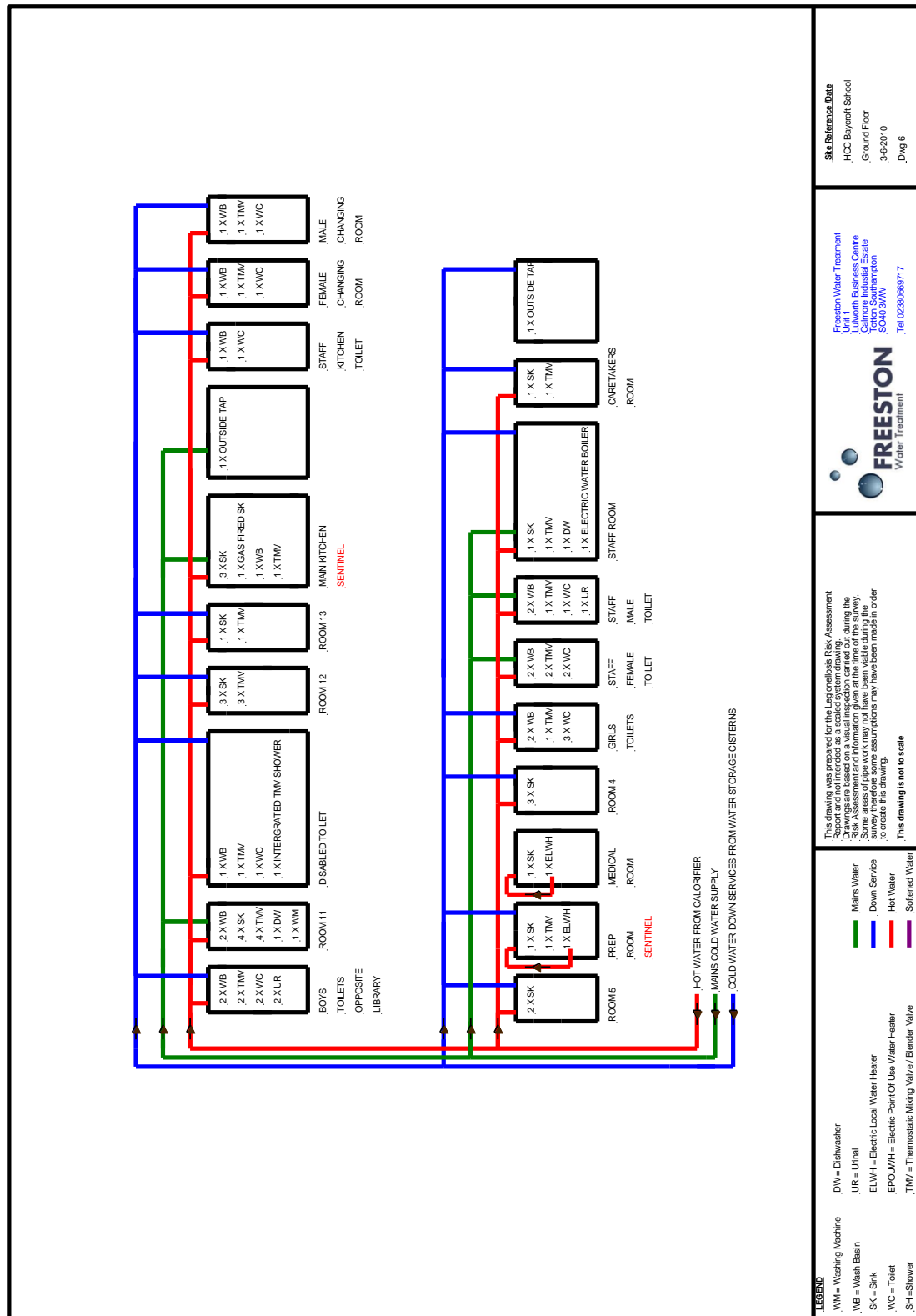
Freston Water Treatment
 Unit 1, Park Business Centre
 Cotmore Industrial Estate
 Totton, Southampton
 SO40 3YW
 Tel: 02380669717



This drawing was prepared for the Legionella Risk Assessment Report and not intended as a scaled system drawing. Drawings are based on a visual inspection carried out during the survey, therefore some assumptions may have been made in order to create this drawing.
 This drawing is not to scale

LEGEND:
 WM = Washing Machine
 WB = Wash Basin
 SK = Sink
 WC = Toilet
 SH = Shower
 DW = Dishwasher
 UR = Urinal
 ELUWH = Electric Local Water Heater
 EPQUWH = Electric Point Of Use Water Heater
 TW = Thermostatic Mixing Valve / Blender Valve

Main Water
 Down Service
 Hot Water
 Softened Water



WRITTEN SCHEME

	Task		Frequency
1	Prepare site logbook for the Site.		ASAP
2	Flush infrequently used outlets.		Weekly
3	Record hot water calorifier flow and return temperatures.		Monthly
4	Record cold water outlet temperatures.		Monthly
5	Record hot water outlet temperatures.		Monthly
6	Record cold water cistern temperatures.		Six Monthly
7	Clean and descale shower head and hose.		Quarterly
8	Purge hot water calorifier to drain and record.		Six Monthly
9	Inspect, clean and disinfect cold water storage cisterns if required.		Annually
10	Internally inspect hot water calorifier annually and descale if required.		Annually

REMEDIAL RECOMMENDATIONS

Legionella Risk Category Key

1 = Insignificant risk.

2 = Controlled risk monitoring is being carried out maintain this standard.

3 = Risk is controlled, but deteriorating conditions could increase risk.

4 = Potential hazards identified.

5 = Risk Uncontrolled.

Site Reference/ Address	Remedial/Recommendations	Priority	Date Actioned	Signature
<u>Hot Water Storage & System</u> HCC Baycroft School	Commence monthly temperature monitoring of the domestic hot water systems; sentinel outlets. Record within a logbook.	5		
	Commence monthly temperature monitoring of the hot water calorifier flow water temperature. Record within a logbook.	5		
	Purge calorifier to drain on at least a six monthly basis and record when carried out.	3		
	If access allows, visually inspect the calorifier internally for scale and sludge on an annual basis.	3		
	Adjust combi boilers to achieve a minimum 50°C at the hot outlets / TMV inlet within one minute.	5		
	Fit a temperature gauge to the return pipe on the Calorifier.	3		

Site Reference/ Address	Remedial/Recommendations	Priority	Date Actioned	Signature
<u>Cold Water Storage</u> HCC Baycroft School	Commence monthly temperature monitoring of the domestic cold water systems; sentinel outlets. Record within a logbook.	5		
	Clean, treat with a WRAS approved coating and disinfect the cold water storage cistern as soon as is practicable. Inspect annually and repeat disinfection if required.	5		
	Fit overflow warning pipes to the cold water storage cisterns.	3		
	Fit WRAS approved insect screens to the overflow and overflow warning pipes on the cold water storage cistern.	3		
	Remove the vent pipes from cold water storage Cistern No. 1 and vent to a foul drain via an air gap. Cover the hole left in the lid with a WRAS approved material.	3		
	Fit WRAS approved screened vents to the lids on the cold water storage cistern.	3		

Site Reference/ Address	Remedial/Recommendations	Priority	Date Actioned	Signature
<u>Distribution</u> HCC Baycroft School	Remove dead leg pipe work or put on a weekly flushing regime and record in the logbook when carried out.	5		
	I would recommend Bacteriological and Legionella water samples be taken if the temperatures fall out of the recommended limits.	5		
	Commence weekly flushing of any low use outlets etc and record when carried out.	5		
	Clean and descale showerhead and hose at least quarterly. Record when carried out.	3		
	Ensure all domestic hot and cold pipe work is insulated within the building.	2		
	Clean / replace the inline scale reducer on the calorifier in-line with the manufacturer's recommendations.	3		
	Service and maintain blender taps and TMV's in-line with the manufacturers' recommendations.	4		