

LEGIONELLA RISK ASSESSMENT

Hot and Cold Domestic Water System

For

**Albion Towers
Golden Grove
Southampton
Hampshire
SO14 1QX**

Prepared By

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16th December 2020



Albion Towers

CONTENTS

PREFACE	Page 3 - 4
INTRODUCTION & LEGIONELLA CONTROL	Page 5 - 12
SITE SURVEY COLD & HOT DISTRIBUTION	Page 13 - 16
WATER TEMPERATURES	Page 17
SHOWERS & ASSET REGISTER	Page 18 - 19
GENERAL, ADDITIONAL PHOTOGRAPHS, DRAWINGS, EMERGENCY PROCEDURES & RECORDS	Page 20- 28
CONTROL MEASURES, SUMMARY & REMEDIAL RECOMMENDATIONS	Page 29 – 46
GLOSSARY OF TERMS	Page 47 – 50
TERMS AND CONDITIONS	Page 51
LEGISLATION	Page 52 – 53
RISK ASSESSOR QUALIFICATIONS AND RELEVANT EXPERIENCE	Page 54

PREFACE

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Date of Assessment: 16th December 2020

Date of Review: December 2022

MANAGEMENT STRUCTURE

Statutory Duty Holder: Not Appointed

Competent Person: Not Appointed

Deputy Competent Person: Not Appointed

INTRODUCTION & LEGIONELLA CONTROL

Albion Towers is a large 15 storey building which contains residential flats. This risk assessment is for the Staff areas only, which comprises of the Warden Cleaners Room, Pump Room and two toilets, all on the Ground floor and a Staff Community Room on the 4th floor. At the time of this assessment the Cleaners Room was inaccessible due to vandalism. There is a Community Room on the 2nd floor which is in use by contractors and no access was available.

During the course of the survey water systems within the building were risk assessed. These systems were chosen as being fully representative of the overall domestic water systems and outlets within the building.

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 L8:2013 - The control of Legionella bacteria in water systems (Approved Code of Practice and Guidance on Regulations), HSG274:2013 Legionnaires Disease: Technical Guidance and BS8580-1:2019 Water Quality – Risk Assessments for Legionella Control – Code of Practice.

The survey has been limited to the terms of reference agreed between Southampton City Council and Freeston Water Treatment Ltd. Observations relating to system conditions and other factors applicable to the requirements of ACoP L8, HSG274 and BS8580-1 have been recorded during the survey and specific references are made to compliance with the ACoP and the Technical Guidance in the Observations section of the report.

A Summary of Recommendations concludes the report. ACoP L8:2013 and HSG274 place 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.

Legionella Bacteria

- Legionellaceae are common environmental bacteria found in most natural water resources, including lakes and rivers. They can also survive water treatment processes in small numbers and can occur within mains water. Should these bacteria then enter any water service where they can multiply, and where a means of creating and transmitting water droplets is present, people using or in the vicinity of these services may be at risk.
- Infections caused by Legionella pneumophila bacteria or other organisms within the family Legionellaceae are termed Legionellosis. Legionnaires' disease is the worst of these and causes a pneumonia which can be fatal. Those most at risk are the very old and very young, the immunosuppressed and smokers etc.
- Legionella bacteria can also cause other, less harmful illnesses such as Pontiac fever and Lochgoilhead fever, which can affect all people.

The primary route of infection is caused by inhaling airborne water droplets that contain Legionella and are small enough to pass deep into the lung. It is also now believed that the disease can be contracted by inhaling Legionella bacteria following:

- Ingestion of contaminated water by susceptible individuals. It is rarely spread from person to person.
- The majority of individual cases or outbreaks of disease have been attributed to domestic water services within buildings which can cause a spray / aerosol e.g. showers, toilets, taps, WCs and also evaporative cooling towers, whirlpool spas, swimming pools, irrigation water systems, vehicle washes etc.

- Legionnaires' 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.

A number of factors are required to create a risk of Legionellosis:-

- The presence of Legionella bacteria.
- Conditions suitable for the proliferation of those bacteria.
- A means of creating and disseminating an aerosol.
- The presence of individuals who may be exposed.

The conditions favouring the proliferation of Legionella are: -

- Moisture
- Temperature between 20.0°C and 45.0°C
- Availability of nutrients, for example, from sediment, sludge, organic material, scale, rust, compatible organisms and materials used in construction of water systems
- Presence of biofilm (bacterial slime) on surfaces in contact with water

The elimination of as many of these conditions as possible forms the basis of control of the risk. Treatment regimens to eradicate or reduce the proliferation of Legionella (based on physical or chemical disinfection of water systems) also help to control the risk but do not prevent it.

Under the ACoP, a suitable and sufficient assessment is required to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems on the premises and any necessary precautionary measures.

Management Control

The Health and Safety Executive (HSE) highlights that poor management control and lack of record keeping can be major factors contributing to the inadequate control of Legionella bacteria. At all times there should be a documented Statutory Duty Holder, Competent Person, Deputies and a suitable communication pathway list.

All personnel involved with Legionella management should be suitably trained and competent. Refresher training should be undertaken as required.

A Written Scheme should be in place to ensure that all necessary controls and procedures are maintained, monitored and remain effective. The Risk Assessment does not involve the preparation of the written scheme but rather provides information that is critical to the preparation.

Regulations and guidance regarding the Written Scheme can be found in ACoP L8 Paragraphs 58-64.

Regulations and guidance regarding the Risk Assessment can be found in ACoP L8 Paragraph 28.

This assessment was carried out on behalf of Southampton City Council.

ACoP L8:2013 - The control of Legionella bacteria in water systems (Approved Code of Practice and Guidance on regulations), which was published by the Health and Safety Executive states in paragraph 28

A suitable and sufficient assessment must be carried out to identify and assess the risk of exposure to legionella bacteria from work activities and water systems on the premises and any precautionary measures needed. The duty holder is responsible for ensuring the risk assessment is carried out.

The duty holder is either

- *The employer, where the risk from their undertaking is to their employees or to other; or*
- *A self-employed person, where there is a risk from their undertaking to themselves or to others; or*
- *The person who is in control of the premises or systems in connection with the work where the risk is present from systems in the building (e.g. Tenants where the building is let. However, the landlord retains responsibility for its maintenance).*

The assessment needs to be reviewed regularly and, in any case, whenever there is reason to believe that the original assessment may no longer be valid.

In ACoP L8:2013 paragraph 49 the importance of using competent service providers, it states;

“Those appointed to carry out the risk assessment and draw up and implement precautionary measures should have such ability, experience, instruction, training and resources to enable them to carry out their tasks competently and safely”.

Then at paragraph 57 it states;

“Duty holders should make reasonable enquiries to satisfy themselves of the competence of contractors in the area of work”

Paragraph 57 further states:

“An illustration of the levels of service to expect from Service Providers can be found in the Code of Conduct administered by the Legionella Control Association”

Freeston Water Treatment Ltd is registered with The Legionella Control Association (LCA). To be registered with the LCA a service provider has to agree to meet nine key service provider commitments and they are required each year, as evidence that they meet these commitments, to submit to the LCA secretariat an up to date statement of compliance. The statement should explain how the registering company complies with the nine commitments in terms of the Legionella control services that it provides.

Other Important Information

HSG274 Part 2 makes specific comments and recommendations regarding Thermostatic Mixing Valves – please note the extracts below: -

Section 2.74

TMVs are valves that use a temperature sensitive element and blend hot and cold water to produce water at a temperature that safeguards against the risk of scalding, typically between 38.0°C and 46.0°C depending on outlet use. The blended water downstream of TMVs may provide an environment in which legionella can multiply, thus increasing the risks of exposure.

Section 2.75

The use and fitting of TMVs should be informed by a comparative assessment of scalding risk versus the risk of infection from legionella. Where a risk assessment identifies the risk of scalding is insignificant, TMVs are not required. The most serious risk of scalding is where there is whole body immersion, such as with baths and showers, particularly for the very young and elderly, and TMVs should be fitted at these outlets. Where a risk assessment identifies a significant scalding risk is present, e.g. where there are very young, very elderly, infirm or significantly mentally or physically disabled people or those with sensory loss, fitting TMVs at appropriate outlets, such as hand washbasins and sinks, is required.

The above recommendations mean that consideration should be given to removing TMVs where a scalding risk (as outlined above) is not significant. Where hot water temperatures are likely to be elevated it would be advisable to affix a Hot Water warning sign adjacent to the outlet.

Periodic Review

BS8580-1:2019 states that the Risk Assessment is an ongoing process which should be continually reviewed and updated as and when there are changes.

BS8580-1:2019 states that the original Risk Assessment should be formally reassessed when there are significant changes to ensure that it remains valid, for example, when there are:

- a) changes to the water system or its use;
 - b) changes to the use of the building or part of the building in which the system is installed;
 - c) changes to the availability of information about risks or control measures;
 - d) indications that control measures are no longer effective;
 - e) any of the factors in Clause 4;
 - f) new construction works or system modifications planned;
- or
- g) changes to the key personnel, contractors and service providers.

Where a reassessment has not been triggered by the above, there should be a policy of planned reassessment.

BASED ON THIS SURVEY IT IS OUR RECOMMENDATION THAT A REVIEW SHOULD BE CARRIED OUT AT A MINIMUM FREQUENCY OF 2 YEARS AT THIS SITE.

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 domestic water system as possible although some areas, such as pipework beneath floors or behind walls, would not have been inspected due to restricted access.

SITE SURVEY

The following section contains the condition survey reports for all water systems and associated plant located within the buildings premises. This includes where fitted:

- Cold Water Storage Tanks
- Calorifiers / Hot Water Cylinders
- Local Water Heaters <15 litres
- Local Water Heaters > 15 litres
- Showers
- Water Softeners
- Hot and Cold Water Distribution Temperatures
- Any Other Water Systems

Any points of note or results that are out of parameter are highlighted in red.

System Reference	Domestic Water Systems
Location	Albion Towers Staff Areas
Method	Visual Assessment and Temperature Profiling

DOMESTIC HOT WATER STORAGE

There was no domestic hot water storage in Albion Towers Staff Areas seen at the time of this assessment.

I was unable to gain access to the Cleaners Room as the door had been nailed shut due to vandalism. I would recommend that access is made available as soon as possible to enable any domestic water contained within the Cleaners Room to be monitored and flushed as necessary.

ACoP L8 recommends hot water storage (greater than 15 litres) should be at a minimum of 60.0°C at all times and where fitted, the return hot water should be a minimum of 50.0°C at all times.

LOCAL WATER HEATERS

There are two Local Water Heaters within Albion Towers Staff areas located on the 4th floor. I was unable to gain access to the 2nd floor area as it is in use by contractors.

The 4th floor Staff Community Room Kitchen area is served by a Local Water Heater manufactured by Heatrea Sadia. The heater is supplied by the cold mains service and is of 7 litre capacity. The heater is Point of Use and serves the Kitchen sink only.

At the time of this assessment the heater was storing water at a temperature of 54.3°C, this is Satisfactory.

The 4th floor Staff Community Room Toilet is served by a Local Water Heater manufactured by Heatrea Sadia. The heater is supplied by the cold mains service and is of 7 litre capacity. The heater is Point of Use and serves the Toilet wash basin only.

At the time of this assessment the heater was storing water at a temperature of 60.4°C, this is Satisfactory.

It is recommended in the ACoP L8 and HSG 274 part 2 that water heaters with no greater than 15 litres capacity should operate at 50°- 60°C

COLD WATER STORAGE

There is no cold water storage within Albion Towers. The flats on floors 1 to 6 and the Staff areas are served by the cold mains service which was seen to rise in the Pump Room. The flats on floors 7 to 15 are served by the cold mains service via a three pump booster set.

Incoming mains cold water supply temperature: 9.9°C Satisfactory

WATER TEMPERATURES

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

At the time of the survey (within one minute) for hot water and (within two minutes) for cold water outlets in the building were recorded as follows: -

Location	Temperature °C			Comments
	Hot	Cold	Mixed	
Gents Toilet		9.9		Satisfactory
Ladies Toilet		9.9		Satisfactory
4 th Floor Kitchen	54.3	11.1		Satisfactory
4 th Floor Toilet	60.4	11.4		Satisfactory

HSG274 Part 2 recommends hot water should achieve a minimum of 50.0°C at the outlet, or at the inlet to the Thermostatic Mixing Valve (TMV) if fitted within one minute.

Cold water should be stored and distributed at no more than 20.0°C and should be a maximum of 20.0°C within two minutes at the outlet.

The maximum hot water from an outlet fitted with a TMV should not exceed more than 46.0°C and should ideally be above 38.0°C.

SHOWERS

There are no showers within Albion Towers Staff areas.

ASSET REGISTER

Albion Towers Staff Areas Domestic Water Asset Register		
Floor Level	Area	Asset Type
Ground	Pump Room	1 x Rising Cold Mains 1 x 2 Pump Booster Set 1 x Fire Sprinkler 3 Pump Set 1 x Fill Line to Boiler Room 1 x Bib Tap
Ground	Cleaners Room	No Access
Ground	Ladies Toilet	1 x Wash Basin 1 x WC 1 x Feed to pump Room Bib Tap
Ground	Gents Toilet	1 x Wash Basin 1 x WC
2 nd Floor	Community Room Kitchen	No Access
2 nd Floor	Maintenance Room Toilet	No Access
4 th Floor	Community Room Kitchen	1 x Local Water Heater 1 x Sink
4 th Floor	Community Room Toilet	1 x Local Water Heater 1 x Wash Basin 1 x WC

GENERAL

- Dead leg pipework are ideal areas for the proliferation of bacteria and should be removed or put on a weekly flushing regime (without creating an aerosol) and recorded within the logbook. Dead legs were found in the following areas:-
 - DL1 – Pump Room – The pipework to the booster pumps expansion vessel is creating a dead leg.
 - DL2 – Pump Room - There is a dead leg on the pipework to the Bib Tap.
 - DL3 – Pump Room – There is a dead leg on the distribution pipework at height.

- **All** infrequently used outlets should be flushed (without creating an aerosol) at least on a **weekly** basis for two minutes and recorded within a logbook when carried out. If these outlets are not required, then I would recommend removal along with all associated pipework to prevent dead leg areas. This should also be recorded within the water hygiene logbook. Flushing records were seen at the time of this assessment and were seen to be up to date. I would recommend that all infrequently used outlets, including the Bib tap in the Pump Room are added to the weekly flushing regime.

- The Fire Sprinkler System is supplied by the rising cold mains service in the pump room. The supply to the system is fitted with backflow protection close to cold mains pipework, dead leg pipework still remains. A drain point has been added to enable flushing, I would recommend that this is carried out and recorded in the logbook when done. I would also recommend that when the fire system is serviced and flushed through that this is also recorded in the water systems logbook.

- All tap outlets within the buildings should be kept free of scale build up as this is an ideal nutrient for bacteria proliferation, clean on a regular basis. This should be recorded within the logbook when carried out.
- Flexible Hoses were seen in the Ground floor toilet. Flexible hoses should be WRAS approved, change if not or hard plumb pipework
- Monthly temperature monitoring of the hot and cold outlets for September, October and November 2020 only were seen recorded in the logbook. The Logbook states that all temperature records are stored electronically and is being signed monthly and was seen to be up to date. I would recommend the temperatures are also recorded in the logbook.
- The pipework within Albion Towers appears to be mainly galvanised. The galvanised pipework is showing signs of rust. Rust is an ideal area for bacteria proliferation. I would recommend that the galvanised pipework is replaced as soon as is practicable.
- There is pipework within the Staff Areas that is not insulated. All pipework should be insulated to minimise heat losses and gains.
- It should be ensured that the booster pumps are set to run sequentially to prevent any dead leg pipework.
- No schematic drawings of the domestic water systems were seen to be filed within the logbook. All schematic drawings should be kept updated when changes are made to the water systems. Schematic drawings are included within this assessment.

- Domestic water samples for legionella testing have not been taken. I recommend that Legionella / Bacteriological water samples are taken for testing if temperatures fall outside of the limits as detailed in HSG274.
- An ACoP L8 / HSG274 compliant water services logbook was seen to be in place and all site staff who are involved in Legionella management should have access. **All** legionella management should be recorded within it, e.g., sampling results, dead leg flushing, infrequently used outlet flushing, monthly outlet water temperatures, cleaning and disinfections, Legionella training, tap and shower descaling etc.
- No management structure was seen listed within the logbook with the names, contact details and responsibilities of the Statutory Duty Holder, the Competent Person and Deputy Competent Persons not appointed. It should be ensured that this is kept up to date reflecting changes in staff and roles.
- I would recommend that Legionella training be undertaken for the required staff. Training certificates should be filed within the logbook.
- A Written Scheme should be produced to ensure that all necessary controls and procedures are maintained, monitored and remain effective. The Risk Assessment does not involve the preparation of the written scheme but rather provides information that is critical to the preparation. I would recommend that a written scheme is produced and filed within the logbook. **Regulations and guidance regarding the Written Scheme can be found in ACoP L8 Paragraphs 58-64.**
- The Water systems logbook should be audited. I would recommend that the logbook is audited on a quarterly basis and recorded when carried out.

ADDITIONAL PHOTOGRAPHS**P1****DL1****Pump Room**

The pipework to the expansion vessel is creating a dead leg.

**P2****DL2****Pump Room**

There is a dead leg on the pipework to the Bib Tap.

**P3****DL3****Pump Room**

Dead leg on the distribution pipework.



P4**Pump Room**

Booster Pumps. Ensure pumps are set to sequence.

**P5****Pump Room**

Supply to the Fire Sprinkler Pump Set. Backflow protection fitted.

**P6****All Outlets**

Outlets should be cleaned and descaled on a regular basis. Scale is an ideal area for bacteria proliferation.



P7**Flexible Hoses**

Flexible hoses should be WRAS approved. If not, change or hard plumb pipework.

**P8****Local Water Heater**

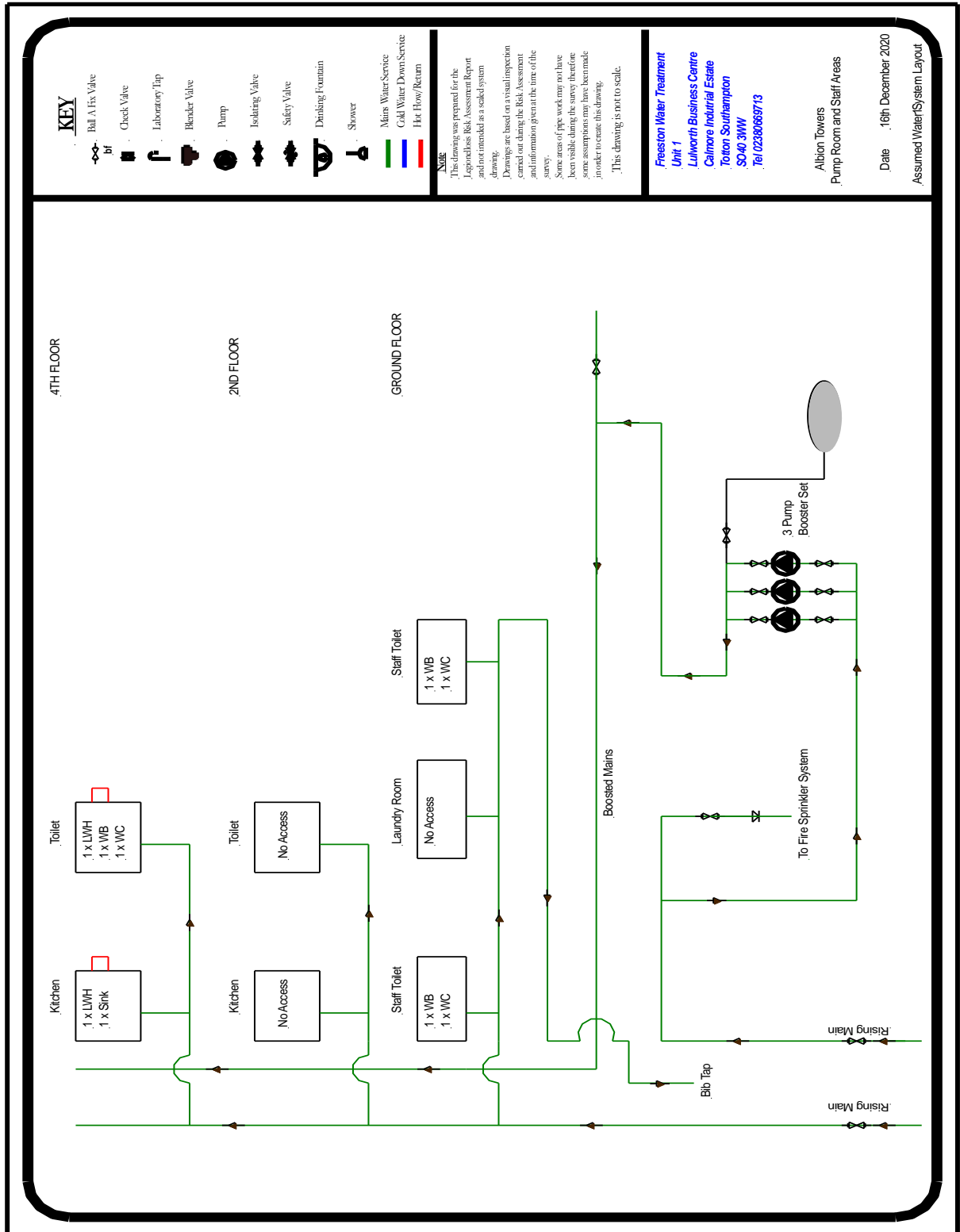
Local Water Heater Fitted to 4th Floor Toilet. Satisfactory storage temperature at the time of this assessment for both 4th floor Local Water Heaters.



EMERGENCY PROCEDURES

There was seen to be no documented emergency procedures in place relating to a possible outbreak of Legionnaires Disease at the time of this risk assessment; I would recommend emergency procedures be drawn up and put in place by referring to Appendix 2.3 and paragraphs 2.125–2.137 of HSG 274 part 2.

DRAWINGS



RECORDS

An ACoP L8 / HSG274 compliant water services logbook was seen to be in place and should include records of weekly, monthly, quarterly and annual procedures. These should be carried out as recommended in this risk assessment.

Details of the responsibilities held by the Duty Holder, Competent Person and Deputy Competent Person should be included together with items listed as follows:

Audit sheet for inspections of the logbook and dated when completed.

Faults and defects to be recorded.

Flushing of all infrequently used outlets and dead legs (weekly).

Maintenance carried out on water systems

Monthly and annual temperature monitoring

Showerhead, hose and tap outlet cleaning and descaling

TMV Servicing and maintenance

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

HSG 274 CONTROL MEASURES TABLE 2.1 (where applicable)**Table 2.1:** Checklist for hot and cold water systems

Service	Action to take	Frequency
Calorifiers	Inspect calorifier internally by removing the inspection hatch or using a boroscope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded	Annually, or as indicated by the rate of fouling
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature	Annually, but may be increased as indicated by the risk assessment or result of inspection findings
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60.0 °C as practicable without going below 60.0 °C) Check calorifier return temperatures (not below 50 °C, in healthcare premises not below 55.0 °C)	Monthly
Hot water services	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50.0 °C within one minute (55.0 °C in healthcare premises)	Monthly
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50.0 °C (55.0 °C in healthcare premises). Temperature measurements may be taken on the surface of metallic pipework	Monthly
	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50.0 °C within one minute of running (55.0 °C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area	Quarterly (ideally on a rolling monthly rota)

Hot water services continued	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50.0 °C (55.0 °C in healthcare premises) to create a temperature profile of the whole system over a defined time period	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
POU water heaters (no greater than 15 litres)	Check water temperatures to confirm the heater operates at 50–60.0 °C (55.0 °C in healthcare premises) or check the installation has a high turnover	Monthly–six monthly, or as indicated by the risk assessment
Combination water heaters	Inspect the integral cold water header tanks as part of the cold water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime	Annually
	Check water temperatures at an outlet to confirm the heater operates at 55–60 °C	Monthly
Cold water tanks	Inspect cold water storage tanks and carry out remedial work where necessary	Annually
	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum/minimum thermometers where fitted	Annually (Summer) or as indicated by the temperature profiling

Cold water services	Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank, but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20.0 °C within two minutes of running the cold tap. To identify any local heat gain, which might not be apparent after one minute, observe the thermometer reading during flushing	Monthly
	Take temperatures at a representative selection of other points to confirm they are below 20.0 °C to create a temperature profile of the whole system over a defined time period. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
	Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment	Annually
Showers and spray taps	Dismantle, clean and descale removable parts, heads, inserts and hoses where fitted	Quarterly or as indicated by the rate of fouling or other risk factors, e.g. areas with high risk patients
POU filters	Record the service start date and lifespan or end date and replace filters as recommended by the manufacturer (0.2 µm membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed, although long-term use of such filters may be needed in some healthcare situations)	According to manufacturer's guidelines
Base exchange softeners	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener	Weekly, but depends on the size of the vessel and the rate of salt consumption
	Service and disinfect	Annually, or according to manufacturer's guidelines
Multiple use filters	Backwash and regenerate as specified by the manufacturer	According to manufacturer's guidelines

Infrequently used outlets	<p>Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should be cut back as far as possible to a common supply (e.g. to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T'</p> <p>Infrequently used equipment within a water system (i.e. not used for a period equal to or greater than seven days) should be included on the flushing regime Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain</p> <p>Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started For high risk populations, e.g. healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment</p>	Weekly, or as indicated by the risk assessment
TMVs	<p>Risk assess whether the TMV fitting is required, and if not, remove</p> <p>Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs</p> <p>To maintain protection against scald risk, TMVs require regular routine maintenance carried out by competent persons in accordance with the manufacturer's instructions.</p>	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations
Expansion vessels	Where practical, flush through and purge to drain	Monthly–six monthly, as indicated by the risk assessment

SUMMARY

At the time of this assessment it was seen that Legionella management is partially being carried out as required by HSG274 Part 2 Table 2.1 within this report but needs to be improved and records kept more thoroughly of all Legionella management within the logbook.

Ensure that all recommendations within this report are read, understood and acted upon.

REMEDIAL RECOMMENDATIONS

Priority Rating	
	High priority issue - Urgent remedial action required to control a serious risk.
	Medium priority issue - Action is required in the near future to achieve compliance with ACoP L8/HSG274 standards/guidelines.
	Low priority issue - Minor action or remedial work that is beneficial, but may not be directly linked with compliance to ACoP L8/HSG274 standards/guidelines.

RECOMMENDATIONS

RECOMMENDATION							
Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
1	1	DL1 – Pump Room – The pipework to the booster pumps expansion vessel is creating a dead leg. Dead leg pipework is an ideal area for the proliferation of bacteria (including Legionella) and should be removed or flushed (without creating an aerosol) for at least two minutes at least on a <u>weekly</u> basis and recorded within the logbook when carried out.					Low

RECOMMENDATION

RECOMMENDATION							
Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
2	2	DL2 – Pump Room - There is a dead leg on the pipework to the Bib Tap. Dead leg pipework is an ideal area for the proliferation of bacteria (including Legionella) and should be removed or flushed (without creating an aerosol) for at least two minutes at least on a <u>weekly</u> basis and recorded within the logbook when carried out.					Low

RECOMMENDATION

RECOMMENDATION							
Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works		Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion
3	3	DL3 – Pump Room – There is a dead leg on the distribution pipework at height. Dead leg pipework is an ideal area for the proliferation of bacteria (including Legionella) and should be removed or flushed (without creating an aerosol) for at least two minutes at least on a <u>weekly</u> basis and recorded within the logbook when carried out.					Low

RECOMMENDATION

Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
4		All infrequently used outlets should be flushed (without creating an aerosol) at least on a weekly basis for two minutes and recorded within a logbook when carried out. If these outlets are not required, then I would recommend removal along with all associated pipework to prevent dead leg areas. This should also be recorded within the water hygiene logbook. Flushing records were seen at the time of this assessment and were seen to be up to date. I would recommend that all infrequently used outlets, including the Bib tap in the Pump Room are added to the weekly flushing regime.				Low	

RECOMMENDATION

RECOMMENDATION							
Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
5	5	The Fire Sprinkler System is supplied by the rising cold mains service in the pump room. The supply to the system is fitted with backflow protection close to cold mains pipework, dead leg pipework still remains. A drain point has been added to enable flushing, I would recommend that this is carried out and recorded in the logbook when done. I would also recommend that when the fire system is serviced and flushed through that this is also recorded in the water systems logbook.				Low	
6	4	It should be ensured that the booster pumps are set to run sequentially to prevent any dead leg pipework.				Low	

RECOMMENDATION

Risk		HIGH	System	DOMESTIC WATER SYSTEMS		
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion
7		I was unable to gain access to the Cleaners Room as the door had been nailed shut due to vandalism. I would recommend that access is made available as soon as possible to enable any domestic water contained within the Cleaners Room to be monitored and flushed as necessary.				Low
8		There was seen to be no documented emergency procedures in place relating to a possible outbreak of Legionnaires Disease at the time of this risk assessment; I would recommend emergency procedures be drawn up and put in place by referring to Appendix 2.3 and paragraphs 2.125–2.137 of HSG 274 part 2.				Zero

RECOMMENDATION

RECOMMENDATION							
Risk		HIGH	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
9		An ACoP L8 / HSG274 compliant water services logbook was seen to be in place and all site staff who are involved in Legionella management should have access. All legionella management should be recorded within it, e.g. sampling results, dead leg flushing, infrequently used outlet flushing, monthly outlet water temperatures, cleaning and disinfections, Legionella training, tap and shower descaling etc.				Zero	

RECOMMENDATION

RECOMMENDATION						
Risk		HIGH	System	DOMESTIC WATER SYSTEMS		
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion
10		I would recommend that Legionella training be undertaken for the required staff. Training certificates should be filed within the logbook.				Zero
11		No management structure was seen listed within the logbook with the names, contact details and responsibilities of the Statutory Duty Holder, Competent and Deputy Competent Persons not appointed. It should be ensured that this is kept up to date reflecting changes in staff and roles.				Zero

RECOMMENDATION

RECOMMENDATION						
Risk		HIGH	System	DOMESTIC WATER SYSTEMS		
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion
12		A Written Scheme should be produced to ensure that all necessary controls and procedures are maintained, monitored and remain effective. The Risk Assessment does not involve the preparation of the written scheme but rather provides information that is critical to the preparation. Regulations and guidance regarding the Written Scheme can be found in ACoP L8 Paragraphs 58-64.				Zero

RECOMMENDATION

RECOMMENDATION							
Risk		MEDIUM	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
13	6	All outlets should be kept free of scale build up as this is an ideal nutrient for bacteria proliferation, clean on a <u>regular</u> basis. This should be recorded within the logbook when carried out				Low	
14	7	Flexible Hoses should be WRAS approved, change if not or hard plumb pipework.				Low	
15		Monthly temperature monitoring of the hot and cold outlets for September, October and November 2020 only were seen recorded in the logbook. The Logbook states that all temperature records are stored electronically and is being signed monthly and was seen to be up to date. I would recommend the temperatures are also recorded in the logbook.				Low	

RECOMMENDATION

RECOMMENDATION							
Risk		MEDIUM	System	DOMESTIC WATER SYSTEMS			
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion	
16		The pipework within Albion Towers appears to be mainly galvanised. The galvanised pipework is showing signs of rust. Rust is an ideal area for bacteria proliferation. I would recommend that the galvanised pipework is replaced as soon as is practicable				Low	
17		I recommend that domestic water samples are taken for Legionella / Bacteriological testing if temperatures fall outside of the limits as detailed in HSG274.				Low	

RECOMMENDATION

RECOMMENDATION						
Risk		LOW	System	DOMESTIC WATER SYSTEMS		
Ref No	Photo No	Works	Comments:	Work Assigned To:	Date Completed	Residual Risk After Completion
18		There is pipework within the Staff Areas that is not insulated. All pipework should be insulated to minimise heat losses and gains.				Low
19		No schematic drawings of the domestic water systems were seen to be filed within the logbook. All schematic drawings should be kept updated when changes are made to the water systems.				Zero
20		Audit Logbook on at least a quarterly basis.				Zero

GLOSSARY

This section contains the glossary of terms that may have been used within this documentation.

Aerosol	A suspension in a gaseous medium of solid particles, liquid particles or solid and liquid particles having a negligible falling velocity. In the context of this document, it is a suspension of particles which may contain legionella with a typical droplet size of <5 µm that can be inhaled deep into the lungs.
Algae	A small, usually aquatic, plant that requires light to grow.
Bacteria	(Singular bacterium) a microscopic, unicellular (or more rarely multicellular) organism.
Biocide	Substance which kills microorganisms.
Biofilm	A community of bacteria and other microorganisms embedded in a protective layer with entrained debris, attached to a surface.
Calorifier	An apparatus used for the transfer of heat to water in a vessel, the source of heat being contained within a pipe or coil immersed in the water
Chlorine	An element used as a biocide and for disinfection
Chlorine dioxide	A compound used as a biocide.
Cold water service	Installation of plant, pipes and fitting in which cold water is stored, distributed and subsequently discharged.
Contact time	The time a chemical is retained in the system.
Corrosion inhibitors	Chemicals which protect metals by: passivating the metal by the promotion of a thin metal oxide film (anodic inhibitors); or physically forming a thin barrier film by controlled deposition (cathodic inhibitors).

Dead end/blind end	A length of pipe closed at one end through which no water passes.
Dead leg	A length of water system pipework leading to a fitting through which water only passes infrequently when there is draw off from the fitting, providing the potential for stagnation.
Disinfection	The reduction of the number of microorganisms to safe levels by either chemical or non-chemical means (e.g. biocides, heat or radiation).
Distribution circuit	Pipework which distributes water from hot or cold water plant to one or more fittings/appliances.
Domestic water	Hot and cold water intended for drinking, washing, cooking, food preparation or other domestic purposes.
Fouling	Organic growth or other deposits on heat transfer surfaces causing loss in efficiency.
Hot water service	Installation of plant, pipes and fittings in which water is heated, distributed and subsequently discharged (not including cold water feed tank or cistern).
Legionnaires' disease	A form of pneumonia caused by bacteria of the genus legionella.
Legionella (plural legionellae)	A bacterium (or bacteria) of the genus legionella.
Legionellosis	Any illness caused by exposure to legionella.
Microorganism	An organism of microscopic size, including bacteria, fungi and viruses.
Neonates	New born children.
Nutrient	A food source for microorganisms.
Pasteurisation	Heat treatment to destroy microorganisms, usually at high temperature.

pH	The logarithm of the reciprocal of the hydrogen ion concentration in water, expressed as a number between 0 and 14 to indicate how acidic or alkaline the water is. Values below 7 are increasingly acidic, 7 is neutral, and values higher than 7 are progressively alkaline. However, acidity and alkalinity are not proportional to pH.
Planktonic	Free-floating microorganisms in an aquatic system.
Point of use (POU) filters	A filter with a maximal pore size of 0.2 µm applied at the outlet, which removes bacteria from the water flow.
Ppm	Parts per million) a measure of dissolved substances given as the number of parts there are in a million parts of solvent. It is numerically equivalent to milligrams per litre (mg/l) with respect to water.
Risk assessment	Identifying and assessing the risk from Legionellosis from work activities and water sources on premises and determining any necessary precautionary measures.
Scale inhibitors	Chemicals used to control scale. They function by holding up the precipitation process and/or distorting the crystal shape, thus preventing the build-up of a hard adherent scale.
Sentinel taps	For hot water services – the first and last taps on a recirculating system. For cold water systems (or non-recirculating HWS), the nearest and furthest taps from the storage tank. The choice of sentinel taps may also include other taps which represent parts of the recirculating system where monitoring can aid control
Sero-group	A sub-group of the main species.
Sessile	Aquatic microorganisms adhering to a surface, normally as part of a biofilm.

Shunt pump	A circulation pump fitted to hot water service/plant to overcome the temperature stratification of the stored water.
Slime	A mucus-like exudate that covers a surface produced by some microorganisms.
Sludge	A general term for soft mud-like deposits found on heat transfer surfaces or other important sections of a cooling system. Also found at the base of calorifiers and cold water storage tanks.
Stagnation	The condition where water ceases to flow and is therefore liable to microbiological growth.
Strainers	Coarse filters usually positioned upstream of a sensitive component, such as a pump control valve or heat exchanger, to protect it from debris.
Thermal disinfection	Heat treatment to disinfect a system.
Thermostatic mixing valve	A mixing valve in which the temperature at the outlet is pre-selected and controlled automatically by the valve.
Total viable counts (TVC)	The total number of culturable bacteria (per volume or area) in a given sample (does not include legionella).
Wholesome water	Water supplied for such domestic purposes as cooking, drinking, food preparation or washing; or supplied to premises in which food is produced

If any further information is required, please feel free to contact Freeston Water Treatment Ltd, or the surveyor responsible for the works on your site.

TERMS AND CONDITIONS

This assessment is based on information known to Freeston Water Treatment Ltd on the date of survey. Freeston Water Treatment Ltd accepts no responsibility for any loss or claim arising from information contained within this or any other associated document; “All our Risk Assessors are fully trained and competent to carry out Legionella Risk Assessments”.

Freeston Water Treatment Ltd reserve the right to allow our client fourteen days in which to notify Freeston Water Treatment Ltd of any inaccuracies contained within this documentation or changes that should be made, after which it will be assumed that our client has accepted the documentation to be satisfactory and fully complete.

Freeston Water Treatment Ltd rights reserved. No part of the format and content of this documentation may be reproduced, stored in a retrieval system or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of Freeston Water Treatment Ltd.

In accordance with ACoP L8 (2013), Paragraph 47 – The Risk Assessment must be reviewed regularly and/or whenever there is reason to believe that the original assessment may no longer be valid.

We cannot guarantee that all pipework passing underground or through floors, walls and ceilings has been traced, and it is possible that certain system dead-ends or dead legs may not have been identified. As a result any schematic diagram(s) contained within this report only detail the visible or assumed pipework.

Whilst every effort has been made to ensure the accuracy of the content of this document, Freeston Water Treatment Limited will accept no responsibility for any omissions.

LEGISLATION

Health and Safety at Work etc. Act 1974

This Act is concerned with health, safety and welfare in connection with work and those people who may be affected by it. The act is primary legislation under which the Secretary of State makes specific regulations affecting the control of Legionellosis.

Management of Health and Safety at Work Regulations 1999

The regulations provide a framework for managing health and safety at work including the requirement for risk assessments and the establishment of appropriate management systems and procedures.

Control of Substances Hazardous to Health Regulations 2002 (as amended)

The aim of the Control of Substances Hazardous to Health (COSHH) Regulations 2002 is to protect persons who may be affected by hazardous substances present in the workplace. This includes both chemical and biological agents. The employer has to assess the risk from such substances, and for certain substances he has to measure the employees' exposure to them.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

While Legionnaires' disease as such is not a notifiable disease under public health legislation (except in Scotland), it is reportable under RIDDOR if it could have been contracted in the workplace.

Notification of Cooling Towers and Evaporative Condensers Regulations 1992

These regulations require all premises containing a cooling tower or evaporative condenser to notify the local authority in whose area the building is situated. A form is available from the Environmental Health Department of the local authority. Notification must also be given of changes to the information supplied. It is however inspectors of the Health and Safety Executive who police the safe operation of cooling towers.

Water Supply (Water Fittings) Regulations 1999

These regulations are not directly concerned with the Legionellosis hazard, but govern the design, construction and use of materials in water systems. In particular they cover: -

- Backflow protection, i.e. the use of air gaps and not-return valves to protect the supply.
- The maintenance of water quality, e.g. tank design for hot and cold water services.
- The use of materials, i.e. those that do not promote bacterial growth.
- Water conservation, i.e. prevention of leakage.

RISK ASSESSOR QUALIFICATIONS & EXPERIENCE

TRAINING DESCRIPTION	BY WHOM	DATE
RESPONSIBLE PERSON – LEGIONELLA MANAGEMENT	HYDROVIRON	SEPT 2013
TMV MAINTENANCE	HORNE ENGINEERING	SEPT 2013
LEGIONELLA COOLING TOWERS AND AIR CONDITIONING	CITY AND GUILDS	SEPT 2013
RISK ASSESSMENT OF WATER SYSTEMS IN BUILDINGS	CITY AND GUILDS	SEPT 2013

Over 40 years' experience in domestic, commercial, oil, water, chemical and power station pipework and systems before training as a Risk Assessor.

Employed full time as a Risk Assessor with Freeston Water Treatment Limited since 2013.

Signed:



Risk Assessor

Freeston Water Treatment Ltd

Report Checked by:



I V Clarenbone AMRSPH
Quality Manager

Date: 21 December 2020