Fitwel
Legionella Water Management Policy
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This document provides project teams with a policy that can be used as a template and adopted in full to comply with requirements of the Legionella Water Management Policy. Project teams can either use the exact content of this document to establish new policies, or update existing policies by adding any missing components from the below.

A qualifying legionella water management policy must include the following:

1. Implementation

☐ when implementing the policy in a multi-tenant commercial and residential asset, the policy will apply to the building’s main water system.

☐ when implementing the policy in a single tenant asset or commercial interior asset, the policy will apply to all water supplies within tenant spaces.

2. Water Management Team

Establish a multidisciplinary water management program team that includes representatives from the following groups:

☐ building owner/management team

☐ technical experts

3. Water System Overview

Develop a description of the building water system in graphic and written form, that outlines the following:

☐ Water Source and Flow: provide a Process Flow Diagram (simple one page diagram) that clearly shows the following:

  • connections to external water sources
  • distribution system for drinking water supply, including the following:
    • receiving
    • cold water distribution
    • heating methods
    • hot water distribution
    • waste (water to drain or sewer)
• location of hot tubs, water heaters or boilers, and cooling tubs

☐ Water Use: a short description of how the water is processed and flows through the building to the point of distribution at fixture locations

4. Legionella Mitigation

☐ Identify areas susceptible to Legionella growth & spread, due to the following conditions:
  • water temperature (77–108°F, 25–42°C)
  • stagnation or reduction in use
  • no or reduced use of disinfectant

☐ Establish hazard control measures that can be applied to reduce risk of Legionella contamination, for example:
  • flushing protocol with frequency (daily/weekly/monthly) and duration (minutes)
  • maintaining water heaters at appropriate temperatures
  • continuously maintaining and monitoring disinfectant and chemical levels

5. Legionella Monitoring

Determine how control measures can be regularly monitored through one or more on-site strategies, for example:

☐ visual inspections
☐ flushing water system following extended closures or significant decreases in occupancy
☐ checking disinfectant levels
☐ checking temperatures

6. Legionella Elimination

Establish interventions and/or contingency responses to eliminate legionella from water system (there is no known safe level of legionella, so the healthy limit for legionella is 0.00 cfu/ml), for example:

☐ setting water heater to at least 140°F or 60°C
☐ adding disinfectant
☐ flushing fixture for 3 minutes when oxidant levels are low

7. Housekeeping

☐ Develop procedures to verify and validate the water management program is operational throughout the building water system:
  • verification: confirm that program is being implemented as designed (e.g. keeping records that the water management program team did what they said they would do)
  • validation: confirm program has been implemented as designed and is effectively controlling legionella throughout the building water system through the following:
    • Testing for legionella following any extended building closure (2 weeks or more) or significant reduction in occupancy
• Performing test(s) to determine if the water system is operating safely and when legionella results are outside healthy range/limits determine how to respond to bring water quality back into range/limit. The healthy limit for legionella is 0.00 cfu.

☐ Document water management activities and inform building occupants about issues with drinking water quality and steps to take to prevent legionella growth.

8. Informing Tenants and Residents

For multi-tenant commercial and residential buildings only: Inform tenants of how to prevent legionella by implementing the following:

☐ Direct tenants to implement the following legionella prevention protocols when they vacate space for more than 2 weeks:
  • Turn off water supply before leaving for an extended period
  • Upon return, flush plumbing by turning on all water faucets and let run for a few minutes until water feels colder than when first turned on.

☐ Share tenant communication through at least one of the following methods:
  • A digital platform, such as a website, digital application, or display screen in common areas.
  • Communication material, such as notification emails or newsletters.
  • In either relevant leases or a tenant manual (for multi-tenant commercial and residential buildings, only).