Sampling 5/3/2023

Recommendation	Completion Date and additional comments
Develop a corrective action plan within a reasonable timeframe (i.e. within about a week) to address the identified localized contamination at fixtures represented by the sample results.	5/22/2023
Physically clean and disinfect, or alternatively replace, all fixtures represented by positive sample results. Filtration should remain in place until follow-up sampling demonstrates adequate control of localized Legionella contamination.	7/6/2023
Perform ongoing follow-up sampling at regular intervals (e.g., every two weeks for three months followed by every month for an additional three months) to validate continued control of Legionella amplification in the building.	6/6/2023

Sampling 6/6/2023

Recommendation	Completion Date and additional comments
Develop a corrective action plan within a reasonable timeframe (i.e. within about a week) to address the identified localized contamination at fixtures represented by the sample results.	6/14/2023
It is recommended to thoroughly clean (including removal of scale and debris) and disinfect all drinking fountains, followed by validation sampling. In the interim, all of these fixtures should be removed from	6/15/2023

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service, as installation of point of use	
filters is not feasible.	
It is recommended that all automated fixtures be disinfected or replaced, followed by validation sampling. In the interim, all of these fixtures should be equipped with point of use filters or removed from service. It should be noted that while these fixtures have in-line filters in place between building piping and the fixture, such filters do not protect from Legionella in the fixture itself and associated lines after the filter.	7/6/2023
It is recommended that the DCW expansion tank be cleaned and disinfected. In addition, the location of this tank and its proximity to nearby hot water lines should be evaluated in order to reduce future risk of Legionella amplification.	7/1/2023
Perform ongoing follow-up sampling at regular intervals (e.g., every two weeks for three months followed by every month for an additional three months) to validate continued control of Legionella amplification in the building.	7/6/2023

Sampling 7/6/2023

Recommendation	Completion Date and additional comments
Develop a corrective action plan within a reasonable timeframe (i.e.,	7/31/2023- Corrective action plan
within about a week) to address the identified localized contamination at fixtures represented by the sample results. This action plan	Daily flushing began 5/3/2023 and is ongoing.

should include a daily flushing program. Consider hyperdisinfection to address potential re-amplification of Legionella in the centralized DHW and DCW water systems serving the building.	
Install in-line filters on the drinking fountains, or alternatively, remove drinking fountains from service if an appropriate filtration option cannot be identified.	7/17/2023 – In-line filters installed.
Increase the temperature of the domestic hot water storage tank (DHWST) such that DHW delivery temperatures are as close to 120°F as possible. Available guidance recommends that DHW is consistently stored at 140°F or above and DHW delivery temperatures be 120°F or above. Risk of scalding should be considered in accordance with local public health regulations, as applicable.	7/31/2023-DHW delivery temperatures are being investigated to determine cause of lower temperatures, compared to previous testing.
Evaluate the configuration of the roof top DCW expansion tank and its proximity to the nearby domestic hot water return line to assess the potential for conductive heat gain. Consult with a building engineer, as needed.	Ongoing through development of Water Management Plan
Continue to implement point-of-use and in-line filtration at all building fixtures until further validation sampling demonstrates that the Legionella amplification is controlled in building water systems.	7/31/2023- All POU and in-line filters are still in place and providing exposure control to building occupants.
Perform ongoing follow-up sampling at regular intervals (e.g., every two weeks for three	Ongoing- Next sampling event 8/10/2023

months followed by every month for an additional three months) to validate continued control of Legionella amplification in the building.	
Work towards the development and implementation of a comprehensive water management plan to manage ongoing Legionella risk for the property in the future.	Ongoing- On-site assessment conducted on 7/27/2023.