



Shaping Tomorrow's
Built Environment Today

**ASHRAE Comments Concerning the
Pennsylvania Senate Democratic Policy Committee Hearing:
Legionella Prevention
May 5, 2021**

ASHRAE is pleased to submit these comments on the topic of legionella prevention in buildings. As your committee has recognized the COVID-19 pandemic has resulted in a substantial number of buildings shutting down. Re-opening buildings needs to be done using scientifically-based technical standards and guidance to minimize other health risks including through water systems in buildings.

ASHRAE, founded in 1894, is a technical and professional society with a mission to serve humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields. Our more than 50,000 members include about 2,000 members in Pennsylvania. ASHRAE focuses on improving building systems, energy efficiency, indoor environmental quality, refrigeration and sustainability through research, standards writing, publishing, certification and continuing education.

ASHRAE formed an Epidemic Task Force (ETF) in March 2020 to address the COVID-19 pandemic in building-related matters and has developed guidance on building reopening related to ventilation, filtration, air cleaning, and water systems for several building types and operational conditions. Water systems are specifically included in ASHRAE's guidance to minimize the risk of legionellosis associated with water systems after building reopening.

ASHRAE's ETF guidance for reopening buildings recommends the flushing of water systems to remove potential contaminants, including the legionella bacteria, from stagnant equipment. This is critically important given that many buildings have been unoccupied for some time due to the pandemic.

The ETF also recommends the use of ASHRAE Standard 188-2018, *Legionellosis: Risk Management for Building Water Systems*, which establishes minimum legionellosis risk management requirements, and ASHRAE Guideline 12-2020, *Managing the Risk of Legionellosis Associated with Building Water Systems*, which provides detailed guidance for water management program teams to develop the necessary elements of an effective water management plan. The U.S. Environmental Protection Agency also references ASHRAE's Guideline 12 in its recommendations to return the building's plumbing and other water systems to safe operation prior to reopening.¹

¹ U.S. Environmental Protection Agency, "Maintaining or Restoring Water Quality in Buildings with Low or No Use," Version 3, Downloaded on 04-30-2021 at https://www.epa.gov/sites/production/files/2020-05/documents/final_maintaining_building_water_quality_5.6.20-v2.pdf.

We commend this committee for addressing this important topic, and we strongly advise that any requirements are consistent with the totality of ASHRAE Standard 188, as taking only certain portions from it, or adding to it, could impair its effectiveness and potentially put building occupants at risk. ASHRAE's standards, guidelines, and guidance are prepared through a consensus process with input from leading experts in the field. As a society with over 125 years of experience and representing some of the sharpest minds in the industry, we respectfully urge you to rely on the technical materials prepared by ASHRAE. The existing proposal adds requirements well beyond and in conflict with those in ASHRAE Standard 188.

We appreciate the Policy Committee's consideration of ASHRAE's comments on this important matter. Managing water systems to minimize the risk of contamination from Legionella is essential. We welcome your questions and would be happy to provide additional information as needed.