



May 18, 2016

Sam Posner, Ph.D.
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1600 Clifton Road
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Sent via email: sposner@cdc.gov

Re: Comments on Proposed *Legionella* Document
“Developing a Water Management Program to Reduce
Legionella Growth and Spread in Buildings”

Dear Dr. Posner:

The American Industrial Hygiene Association (AIHA) thanks the Centers for Disease Control (CDC) for its response (04/29/16) to AIHA’s April 11, 2016 letter. AIHA commends you and the CDC for taking a lead role in prevention of Legionellosis, a serious and preventable disease predominately transmitted from building systems.

The AIHA *Legionella* work group (part of the AIHA Indoor Environmental Quality Committee) has reviewed your draft document “Developing a Water Management Program to Reduce *Legionella* Growth and Spread in Buildings” and have the following comments:

1. Section G “Make Sure the Program is Running as Designed and is Effective”.
 - The work group believes environmental monitoring that includes sampling for culturable *Legionella* is essential to validate effectiveness of control measures in eliminating or minimizing *Legionella* growth. For purposes of evaluating the effectiveness of remediation and/or control measures, culture testing for *Legionella* should be done.

Reliance on surrogate indicators as proposed by CDC and ASHRAE will not prevent, indicate or validate that *Legionella* amplification is or is not occurring in a water system.

The statement that the program team should make the determination of whether environmental testing should be performed is not defensible. Your letter of April 29, 2016, states that the CDC toolkit is intended for use by building engineers and workers. What expertise do these individuals have to make that decision?

The work group recommends the validation section include the following statement: “Environmental monitoring that includes sampling for viable *Legionella* is essential to validate the effectiveness of control measures in eliminating or minimizing *Legionella* growth.”

2. References & Resources

- In May of 2015, AIHA published its guideline “Recognition, Evaluation and Control of *Legionella* in Building Water Systems”.

AIHA is the premier association of occupational and environmental safety and health professionals. AIHA’s mission is to promote healthy and safe working environments advancing the science, principles, practice and values of industrial hygiene.

Industrial hygienists routinely conduct risk assessments of microbial hazards, aerosol hazards and hazards associated with building systems. AIHA members are primary participants in both proactive and reactive investigations of legionellosis and are directly and materially affected by any guidance or review addressing the recognition, evaluation and control of *Legionella* bacteria in building systems.

The AIHA generated guideline provides extensive guidance for a competent professional to design and execute a successful assessment of building water systems before disease occurs. In many ways the AIHA guidance documents pick up where the ASHRAE standard leaves off.

We were therefore surprised to not see the AIHA guidance document included in the references and resources section. We assume this was an oversight and have attached a copy of the guide for your use and review.

Thank you for giving the industrial hygiene perspective consideration. The members of the AIHA working group would be happy to meet with you or your representatives and/or communicate via other modes.

We appreciate your time and effort.

Respectfully,

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