



April 11, 2016

Nancy Messonnier, MD, MPH
Deputy Director
National Center for Immunization and Respiratory Diseases
1600 Clifton Road
Atlanta, GA 30321

Patrick Breysse, PhD, CIH
Director
National Center for Environmental Health
Agency for Toxic Substances and Disease Registry
4770 Buford Hwy, NE
Atlanta, GA 30341

Dear Dr. Messonnier and Dr. Breysse,

On behalf of the American Industrial Hygiene Association (AIHA), I am writing to you regarding the Centers for Disease Control and Prevention (CDC) draft document “Developing a Water Management Program to Reduce Legionella Growth & Spread in Buildings.” AIHA is concerned that the approaches discussed may be biased and do not include the approach supported by the industrial hygiene profession.

AIHA, the premier association of occupational and environmental safety and health professionals, has more than 75 years of commitment to the protection of workers, their families and their community in matters related to occupational and environmental health and safety. AIHA is also one of the most diverse professional associations dedicated to health and safety with members representing industry, private business, labor, academia and government. AIHA’s mission is to promote healthy and safe working environments advancing the science, principles, practice and value 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 guideline or review addressing the recognition, evaluation and control of Legionella bacteria in building systems.

In early 2014 members of AIHA’s Indoor Environmental Quality (IEQ) Committee recognized the need for more comprehensive guidance on routine assessments performed before any disease has occurred and approaches to validating the effectiveness of Legionella control measures. Building upon guidance provided in the 2005 AIHA Field Guide for the Determination of Biological Contaminants in Environmental Samples, and other authoritative sources, the committee developed a guideline for competent professionals and technicians to follow when assessing Legionella hazards using the fundamental principles of Industrial Hygiene.

Recognizing the need for clear guidance on planning and executing a proactive routine assessment, the AIHA guide provides a thorough description of components, techniques, methods, and observations that should be included. This approach differs from the current public health approach to Legionnaires' disease (LD), that of passive surveillance and only evaluating sources after two or more cases of LD have been confirmed. The industrial hygiene approach advocates the fundamental principles of anticipation, recognition, evaluation and control of workplace and environmental hazards, including Legionella.

AIHA is disappointed that the CDC has not included the industrial hygiene perspective in the draft document. AIHA believes that, in many ways, the AIHA guidance document picks up where ASHRAE Standard 188 and other multi barrier approaches leave off. AIHA respectfully requests the CDC reconsider this omission and the industrial hygiene approach be included in the CDC proposed Legionella toolkit.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "D. H. Anna". The signature is fluid and cursive, with the first name "Daniel" and last name "Anna" clearly distinguishable.

Daniel H. Anna, PhD, CIH, CSP
AIHA President

cc: AIHA Board of Directors