

Risk Bulletin

Reducing Legionnaires' Disease When Business Operations Resume

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As many operations, processes, and even entire buildings may be temporarily removed from service during the pandemic, it is important to consider safe reopening measures for returning occupants. One potential microbial hazard that should be evaluated prior to reopening is *Legionella* (the cause of Legionnaires' disease).

Legionella bacteria can flourish in large, complex water systems that are not properly maintained. For *Legionella*, a "prolonged period" may be weeks or months depending on plumbing-specific factors, disinfectant residuals, water heater temperature set points, water usage patterns, and preexisting *Legionella* colonization¹. A primary concern associated with building-related contamination is inhalation or aspiration of water containing live *Legionella* strains that can infect humans and result in Legionnaires' disease, which may result in death, or the less serious form known as Pontiac fever, which produces flu-like symptoms.

Three key areas for building owners, property managers, and tenants to maintain as they seek to prevent or manage *Legionella* when reopening an operation or a facility:

Domestic Water Systems

- Hot and cold water systems, including bathroom plumbing, should be flushed frequently to prevent stagnation and ensure adequate levels of residual disinfectants.
- Best practices for flushing your water systems include:
 - Flush hot and cold water through all points of use (e.g., showers, sink faucets).
 - Flushing may need to occur in segments (e.g., floors, individual rooms) due to facility size and water pressure. The purpose of building flushing is to replace all water inside building piping with fresh water.
 - If hot water is available in the system, flush the system until the hot water reaches its maximum temperature—while preventing potential scalding risks.
 - Care should be taken to minimize splashing and aerosol generation during flushing.

Other Water-Using Devices

- This category includes a range of devices, such as ice machines and ice makers, hot tubs, spas, and pools, as well as decorative fountains and water features.
- Devices should be drained and shuttered properly prior to any shutdown.
 - Clean all devices and decorative water features:
 - Be sure to follow any recommended manufacturer guidelines for cleaning.
 - Ensure that decorative water features are free of visible slime or biofilm.
 - After the water feature has been refilled, measure disinfectant levels to ensure that the water is safe for use.
 - Ice machines should be emptied (including old ice) and flushed.
 - Safety equipment such as fire sprinkler systems, eye wash stations, and safety showers should also be included in any building's water management program.

Cooling Towers

- Ensure that cooling towers are clean and well maintained (including start-up and shut-down procedures) per manufacturer's guidelines and industry best practices.
- Guidance on start-up and shut-down procedures and disinfection procedures are available from the Cooling Technology Institute (CT 159, WTB-148).
- Ensure that the tower and basin are free of visible slime, debris, and biofilm before use.
- If the tower appears well maintained, perform an online disinfection procedure:
 - Typical chemical treatment would include biocides such as sodium hypochlorite and bromine.
 - For cooling towers, physical treatment such as cavitation and oxidation should be considered.

Proactive Ways to Mitigate *Legionella* Risk—IoT Devices

In addition to maintenance considerations, there are proactive ways to mitigate *Legionella* risk. One way to do this is through Internet of Things (IoT) objects or devices that are connected by the Internet and that are able to collect and exchange data. The IoT can assist in monitoring for conditions that might permit *Legionella* to develop in a water system. For example:

- Real-time sensors can be placed throughout water systems to monitor parameters such as water temperature and flow.
- Sensors are monitored by a central dashboard and the data is stored. That stored data is important for demonstrating compliance with regulatory or industry standards.
- Multiple facilities can be connected to the same dashboard for ease of monitoring.
- The monitoring system can alert a user to a change in condition or to conditions where *Legionella* could thrive.

The sensors used by these monitoring systems are relatively inexpensive and simple to install. Another important consideration is that monitoring systems use LoRaWAN, which is a low-power, wide area networking protocol designed to connect battery-operated “things” to the Internet to transmit data. This means that there is no need to connect to existing networks, which can help mitigate a company's cyber risk.

Reference:

<https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html>

Additional Resources

There are various local government agencies, international agencies and industry groups who offer guidance on specific standards to help building owners address *Legionella* concerns and help reduce the risk in their buildings after a prolonged shutdown. Here are some examples:

[WHO: Legionella and the Prevention of Legionellosis](#)

[ISO](#)

[ANSI/ASHRAE](#)

[Cooling Technology Institute Guideline: Best Practices for Control of Legionella](#)

[CDC: Guidance for Reopening Buildings After Prolonged Shutdown or Reduced Operation](#)

For more local advice and resources, please see the following websites:

[Heath Direct: Legionnaires' disease](#)

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Chubb Risk Engineering can help our insureds evaluate industry specific exposures, controls and attitude towards risk, as well as provide examples of lessons from losses.

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