



**Legionella Risk Assessment
An Industry Perspective**

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Four semi-transparent squares are arranged in a 2x2 grid. The top-left square is light grey and tilted clockwise. The top-right square is light teal and upright. The bottom-left square is light teal and upright. The bottom-right square is light grey and upright.

**The law is the law
could it be any clearer?**

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**Tempered by reasonable
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**Sufficient training and experience
or knowledge and other qualities
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A decorative graphic consisting of four overlapping squares: a light grey square tilted clockwise, a light teal square, a light blue square, and a light grey square. The text is centered over these squares.

The law is the law, could it be clearer?

...because I say so



...because I say so

- 1116h: The bromine level is too high
- 1134h: The rusty suction strainer basket needs to be replaced as it will yield iron, which is a nutrient which will feed *Legionella*

...because I say so

- A risk assessment must be comprehensive and include details of everything that was found, right as well as wrong: a defects log is not enough
- The risk assessment report is too big, it contains a large amount of information which is not relevant, it should concentrate on the faults

...because I say so

- A schematic diagram is a simplified drawing to convey the essentials quickly, it does not need to be detailed
- The box marked “softener” doesn’t look like a softener and the cooling tower has a fan in the side, not the top, as it is shown. Redraft the diagram with these two faults corrected

...because I say so

- Some kind of weighting scheme would help, some assessors use a scoring algorithm
- A scoring system is not acceptable in a risk assessment

L8 paragraph 32

A number of factors are required to create a risk of acquiring legionellosis, such as:

- (a) the presence of legionella bacteria;**
- (b) conditions suitable for multiplication of the organisms eg suitable temperature (20°C-45°C) and a source of nutrients eg sludge, scale, rust, algae and other organic matter;**
- (c) a means of creating and disseminating breathable droplets eg the aerosol generated by a cooling tower or shower; and**
- (d) the presence (and numbers) of people who may be exposed, especially in premises where occupants are particularly vulnerable, eg healthcare.**

L8 paragraph 34

The following list contains some of the factors which should be considered, as appropriate, when carrying out the assessment:

- (a) the source of system supply water, for example, whether from a mains supply or not;**
- (b) possible sources of contamination of the supply water within the premises before it reaches the cold water storage cistern, calorifier, cooling tower or any other system using water that may present a risk of exposure to legionella bacteria;**
- (c) the normal plant operating characteristics; and**
- (d) unusual, but reasonably foreseeable operating conditions, for example breakdowns.**

What is included?

- Does a risk assessment include a schematic diagram?
- Does a risk assessment include a scheme of control
- Does a risk assessment include sampling for *Legionella*?

Industry Perspective

- The law is absolute, but vague
- Enforcement does not seem to be consistent
- The scope of an assessment is open to interpretation



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