

Richard hourigan, inc.

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An Open Letter to ASHRAE regarding their Proposed New Standard 188, Prevention of Legionellosis Associated with Building Water Systems. November 7, 2010.

General: I do not recognize ASHRAE's legal authority to establish a standard for our society. I view this intrusion to be similar to banning smoking in public areas, banning Trans-fats in New York, banning Foie gras in Chicago, and banning Happy Meal Toys in San Francisco. All of the preceding things were done for perceived societal good. If this is only a guideline then I have no problem with it.

Definitions – I do not find the definitions to be adequate with regard to “Centralized hot water heater” – Not defined; “Healthcare Facility” – Not defined; immunocompromised individuals – What is the standard by which this is measured or determined?

Para. 2.2. As long as ASHRAE intends to impose their view on our society, why do you stop at imposing your views on single-family residential buildings? To be consistent shouldn't that be mandatory as well?

Para. 4. “...based upon its risk characterization, the building facility management/owners of the building are required to comply with certain measures...”. By whose authority are they required to comply?

Para. 5.2 (a) “it includes multiple rooms or housing units supplied by one or more centralized hot water heaters,” This is arbitrary. Centralized hot water heater is not adequately defined. Would that heater have to serve on as few as two hot water taps?

Para. 5.2 (b) “it is more than 10 stories high (including any levels that are below grade)”. Again this seems arbitrary. Why is more than 10 stories high risk while 10 or fewer is considered safe?

Para. 5.2 (c) “it is a healthcare facility”. This is not defined. Does that include an outpatient only clinic or a doctor's or dentist's office?

Para. 5.2. (d) “its occupants include immunocompromised individuals or it has special accommodations (sic)for persons having immunocompromising conditions (for example, someone undergoing bone marrow transplantation)”. This is not always a permanent condition, thus it will require constant checks on the status of residents. This does not address immunocompromised visitors to a building. The apartment rental agreements will need to ask these detailed medical questions. There is a strong possibility that a lease may be denied based upon immunocompromising pre-conditions.

Para. 5.4 “After the survey is completed, the preventive measures that are required for the building shall be determined from Table 1:”. Again, required by whose legal authority?

Para. 7.2.1 “An HACCP Team, including at least one person who understands the principles of HACCP. Is this a jobs program for HACCP qualified personnel or for HAACP training companies?”

Para. 7.3 “A single document shall be produced for a complete HACCP plan. The plan shall include, at a minimum, the following eight elements:” The details of the eight elements will be expensive, but that is okay because ASHRAE advocates spending Other People’s Money.

Para. 8.1.3 Operation. Storage and distribution temperatures for potable water systems shall be as follows:

- (a) In health care facilities, nursing homes, and other high-risk building facilities, cold water shall be stored and distributed at temperatures below 25°C (77°F). Hot water shall be stored above 60°C (140°F) and circulated with a minimum return temperature of 51°C (124°F).
- (b) In non-healthcare building facilities or when local regulations prohibit use of the temperatures of 51°C (124°F) and higher, hot water shall be stored at 49°C (120°F) or above.

Compare Para. 8.1. 3 with the US Consumer Product Safety Commission Document #5058 which states:

“Most adults will suffer third-degree burns if exposed to 150 degree water for two seconds. Burns will also occur with a six-second exposure to 140 degree water or with a thirty second exposure to 130 degree water. Even if the temperature is 120 degrees, a five minute exposure could result in third-degree burns.”

Para. 8.2, 8.3, 8.4, & 8.5 The jobs plan for HACCP trained personnel continues. But once again ASHRAE isn’t spending their money, so why care?

Dick Hourigan
President