

**Workplace Health and Safety Queensland**

# **Guide to Legionella Control in Cooling Water Systems, including Cooling Towers**

V2.06-08



**Acknowledgement**

The Department of Employment and Industrial Relations (DEIR) has developed this guidance material for the Queensland community. This material has been reviewed by the following organisations:

Australian Institute of Refrigeration, Air Conditioning and Heating  
Better Water Management P/L  
Clive Broadbent & Associates Pty Ltd  
Complete Water Treatment  
ECC Pty Ltd  
Ecolab Pty Ltd  
GE Infrastructure Water and Process Technologies  
Gordon Gudgeon – Cogent Partners Pty Ltd  
HydroChem P/L  
Hydroshield Pty Ltd  
Integra Water Treatment Solutions  
Nalco Australia  
PERMACLEAN Water Technologies  
Plastics and Chemicals Industries Association  
Property Council of Australia  
QBuild

**Disclaimer**

The materials presented in this publication are distributed by the Department of Employment and Industrial Relations as an information source only. The information and data in this publication is subject to change without notice. The Department of Employment and Industrial Relations makes no statements, representations, or warranties about the accuracy or completeness of, and you should not rely on, any information contained in this publication. This document is a guide only and must be read in conjunction with *the Workplace Health and Safety Act 1995*.

© The State of Queensland (Department of Employment and Industrial Relations) June 2008.

## Table of Contents

Section		Page/s
	Introduction	4-5
1.0	Workplace health and safety legislation - obligations of designers, owners, and persons in control of cooling water systems	
2.0	Registration of cooling towers	5
3.0	Controlling the risk of microbial growth	5-6
4.0	Management of risk factors during the design, installation, and commissioning of cooling water systems	6-7
5.0	Management of risk factors during operation and maintenance of cooling water systems	7
5.1	Quality of makeup water to the cooling water system	8
5.2	Maintenance and servicing of cooling water system by a competent person	9-10
5.2.1	Water treatment program for the cooling water system	10-13
5.2.2	Routine servicing and inspection of a cooling tower	13-14
5.2.3	Routine servicing and inspection of a chiller system	14
5.2.4	Routine cooling tower cleaning procedure	14-15
5.2.5	Emergency disinfection and decontamination of the cooling water system	15
5.2.6	Heterotrophic colony count testing and Legionella testing	15-17
5.2.6.1	Heterotrophic colony count	17
5.2.6.2	Legionella testing	17-18
5.3	Inspection of cooling water system by an on-site person	18-19
5.4	Access to and egress from an area containing a cooling tower	19
5.5	Drift control	19
5.6	Chemical safety	19-20
6.0	Documentation and reporting	20-21
6.1	Cooling water system service reports	21-23
6.2	Cleaning, disinfection, and decontamination reports	23
6.3	Availability of records and reports	23
7.0	Responsibilities of water treatment service providers (WTSP)	23-26
8.0	Evaluation of cooling water system maintenance program	26-27
9.0	Occupational health and safety for water treatment service providers	27
10	Risk management of bleed water reuse	27-28
Table A	Examples of key performance indicators and targets for cooling tower water	22-23
Appendix One	Sample procedure for cleaning cooling towers and related equipment	29-31
Appendix Two	Bacterial Sampling and Testing Methods	32-33
Appendix Three	Control strategies for presence of <i>Legionella</i> and other heterotrophic micro-organisms	34-35
Appendix Four	Emergency disinfection and decontamination procedures	36-37
Appendix Five	<i>Legionella</i> and Legionnaires' disease	38-39
Appendix Six	Further information on occupational health and safety for water treatment service providers	40
Appendix Seven	Requirement to report legionellosis, and the role of Queensland Health and Workplace Health and Safety Queensland	41-42
Appendix Eight	Risk management and water quality standard for the reuse of bleed/blowdown water from cooling towers	43-46
	References and further reading	47

# Guide to Legionella Control in Cooling Water Systems, Including Cooling Towers

## Introduction

Are you the owner, person in control of<sup>1</sup>, or service contractor for a cooling water system that includes components such as a cooling tower, closed circuit fluid coolers or evaporative condenser, or associated chiller and condenser, in industrial usage or air-conditioning situations in Queensland or are you considering reusing the bleed<sup>2</sup> water from a cooling tower? If so it is recommended you use this guide to assist you in complying with your associated Obligations under the Queensland Workplace Health and Safety Act 1995, and in managing the risks from micro-organisms such as *Legionella* bacteria in the components of the cooling water system.

It is recommended that:

- owners, or persons in control of such cooling water system components in Queensland workplaces use this guide when deciding who will be involved in the risk management process and to evaluate the effectiveness of the risk management process; and
- Water Treatment Service Providers<sup>3</sup> (WTSPs) and Chiller Service Providers (CSPs) use this guide to determine the standard of service they should be providing to owners or person in control of cooling water systems, and to determine if they are managing the risks to the health and safety of their own workers; and
- designers and installers of cooling water systems use this guide to identify and minimise potential risk factors in system design.

*Australian/New Zealand Standard 3666 - Air-handling and water systems of buildings- Microbial control*, parts 1, 2, and 3, and its supporting document *SAA/SNZ HB32 - Control of microbial growth in air-handling and water systems of buildings*, specify minimum requirements for design, installation, commissioning, operation and maintenance of air-handling and water systems in buildings to assist in the control of micro-organisms, including *Legionella* bacteria.

*Australian Standard AS 5059-2003 Power station cooling tower water systems – Management of Legionnaires' disease health risk*, sets out control

---

<sup>1</sup> For example, a contractual arrangement between the owner of a cooling tower and the occupant of a workplace at which the cooling tower is located may give control of the cooling tower to the occupant

<sup>2</sup> In addition to evaporation, water is lost from the cooling tower through 'blow down' or 'bleed-off'. This is the intentional release of some of the circulating water from the tower to remove suspended and dissolved solids left behind during the evaporation process. Without blow down, dissolved minerals would result in scale build-up in the system components.

<sup>3</sup> A person or organisation that provides a service to maintain the water of a cooling tower system, so as to minimise microbial growth, and/or scale formation, and/or corrosion within a cooling tower system, by the use of chemical and/or physical agents.

strategies considered to be suitable for minimising the risk of Legionnaires' disease associated with power station cooling water systems.

This guide recognises these Australian Standards as good starting points for *Legionella* risk management and provides additional risk management recommendations.

## **1.0 Workplace health and safety legislation - obligations of designers, owners, and persons in control of cooling water systems**

Under section 32 of the *Workplace Health and Safety Act 1995*, a designer of plant, such as components of cooling water systems, must ensure that the plant is designed to be safe and without risk to health when used properly.

Under section 35 of the *Workplace Health and Safety Act 1995*, owners of plant, such as cooling towers and other components of cooling water systems, have an obligation to ensure the plant is maintained in a condition that ensures the plant is safe, and without risk to health, when used properly.

Where a contractual agreement exists between an owner of a cooling water system and another person that gives effective control of the cooling water system to that person, section 34D of the *Workplace Health and Safety Act 1995* stipulates the person in control of a cooling water system in the relevant workplace area has an obligation to ensure the cooling water system is safe and without risk to health and safety.

The Queensland *Plant Code of Practice 2005* (available at: <http://www.deir.qld.gov.au/workplace/law/codes/plant/index.htm>) gives practical advice on ways to manage exposure to risks related to the use of plant in general. This guide is structured so as it can be used in conjunction with the Plant Code of Practice. The *Risk Management Code of Practice 2007* (available at: <http://www.deir.qld.gov.au/workplace/law/codes/riskman/index.htm>) contains useful risk assessment forms.

## **2.0 Registration of Cooling Towers**

If you are the owner of plant that incorporates a cooling tower you must ensure the cooling tower, which is specified high risk plant, is registered with the Queensland Department of Employment and Industrial Relations - Workplace Health and Safety Queensland Division, before you use this plant, or permit this plant to be used, at a workplace. It is also the responsibility of new owners of existing plant containing cooling towers to check whether such plant is registered.

## **3.0 Controlling the risk of microbial growth**

To reduce contamination by *Legionella* in cooling water systems and the risk of its dispersal into the air, attention must be paid to design, installation, operation, and maintenance. The aim is to minimise microbial multiplication,

to ensure treatment is adequate, and to minimise the production and release of aerosols.

**Critical risk factors** for *Legionella* growth in cooling water systems and resultant infection of people include<sup>4</sup>:

- stagnant water;
- nutrient availability;
- poor water quality;
- deficiencies in the cooling tower; and
- location of the cooling tower system near the public and/or close to other air handling services.

Information on health effects from exposure to *Legionella* can be found in Appendix 5 of this guide.

#### **4.0 Management of risk factors during the design, installation, and commissioning of cooling water systems**

Critical risk factors are more easily controlled during the operation of a cooling water system if the system is designed, installed, and commissioned correctly.

Persons designing, installing, and commissioning a cooling water system should comply with the requirements of *Australian/New Zealand Standard 3666.1 - Air-handling and water systems of buildings- Microbial control, Part 1: Design, installation and commissioning*. This standard includes information on:

1. Water treatment systems for effective management of corrosion, fouling, scaling, and microbial growth.
2. Fabrication materials, for example corrosion-resistant materials.
3. Control of solids by way of an automatic bleed-off capacity.
4. Design, orientation and placement of cooling towers so that direct sunlight is minimised from the wetted surfaces of the cooling tower.
5. Positioning of the cooling water system by:
  - a) Locating the cooling tower, closed circuit fluid coolers, or evaporative condenser to:
    - discharge the cooling tower exhaust at a level above any nearby structure or enclosure or building;
    - avoid cooling tower drift contaminating air-intakes of any nearby air-conditioning and mechanical ventilation systems, for example lift shaft vents;

---

<sup>4</sup> These are a summary of the risks described in Table 2.1 of AS/NZS 3666.3.2000

- avoid where practicable contamination of the cooling tower itself from environmental detritus such as plant foliage, and constant wind blown debris.
- b) Avoidance of locating the cooling tower:
- in plant rooms which also contain the air-handling plant;
  - near areas where people congregate.
- c) Preventing people congregating around a cooling tower by:
- restricting access by use of physical barriers;
  - displaying warning signs to advise of the restricted access;
  - relocation of the cooling tower.

#### 6. Safe access to cooling towers

- cooling towers should be provided with safe access that includes appropriate fixed ladders, internal and external walkways, handrails, toe guards and platforms to facilitate the necessary inspection, maintenance and cleaning.

#### 7. Drift control

- drift eliminators should be fitted to the cooling tower and be capable of controlling drift losses to less than 0.002% at the maximum design water circulation rate through the tower;
- where ratings of drift loss are unobtainable, ensure that the drift eliminators are of modern and high efficiency design;
- ensure that any drift eliminators in a cooling tower have been well fitted to prevent drift escape past or around the drift eliminator panel/s.

The owner or the person in control of the cooling water system should verify that the above control measures 1 to 7 have been implemented.

### **5.0 Management of risk factors during operation and maintenance of cooling water systems**

Persons operating and maintaining a cooling water system should comply at a minimum with the requirements of:

- *Australian/New Zealand Standard 3666.2 - Air-handling and water systems of buildings- Microbial control, Part 2: Operation and Maintenance or;*
- *Australian/New Zealand Standard 3666.3 - Air-handling and water systems of buildings- Microbial control, Part 3: Performance based maintenance of cooling water systems*

A combination of requirements from each of these parts may also be appropriate for a particular cooling water system.

For each cooling water system the owner or person in control should engage a competent<sup>5</sup> person to assess each of the critical risk factors and to document appropriate procedures that address the operation and maintenance of thereof. The procedures could be part of a risk management plan that is unique to each cooling water system.

A risk management plan should outline:

- procedures to manage the critical risk factors;
- key performance indicators and targets for the maintenance of the cooling water system;
- maintenance, service, inspection, and cleaning requirements;
- procedures for reporting of maintenance, servicing, inspection, cleaning, disinfection, and required corrective actions to the cooling water system owner or person in control;
- supply and means of providing makeup water of sufficiently high-quality so that biological contamination, corrosion, and scale deposits within the cooling water system are minimised; and
- how the operation of the chiller/s impact upon the cooling tower risks, for example the number of hours of operation for each chiller/s.

The owner or the person in control of the cooling water system should verify that the above procedures have been implemented.

The owner or the person in control of the cooling water system should regularly review the procedures and the risk management plan to ensure that they are effective and appropriate. A review should also occur on the occasion of a significant event, for example, a cooling tower replacement or a major system upgrade. Note – actions when *Legionella* detections occur are addressed in Appendix 3.

The owner or person in control of the cooling water system should ensure that:

- a competent person is engaged to carry out the maintenance, water treatment, inspection, cleaning, and disinfection/decontamination of the cooling tower system as outlined in this Guide. Water Treatment Service Providers (WTSPs) provide this service. Responsibilities of WTSPs are highlighted in section 7 of this Guide; and
- a competent person is engaged to carry out inspection and maintenance of any chiller or condenser associated with the cooling water system. Chiller Service Providers (CSPs) provide this service.

Specific information on the components of a cooling water system service and maintenance program can be found in sections 5.2 to 5.3 of this guide.

---

<sup>5</sup> A competent person should have suitable experience and knowledge for the task/s being performed.



## 5.1 Quality of makeup water to the cooling water system

The standard or quality of makeup water supplied to a cooling water system should be of sufficiently high quality to minimise biological contamination, corrosion, and scale deposits within the cooling water system.

The quality of the makeup water should be assessed as part of the risk assessment for the cooling water system and should be tested as outlined in Table A, especially if the makeup water includes a “non-drinking” water supply.

Traditionally potable (drinking) water from the municipal water supply is used for makeup water. Increasingly non-potable water such as recycled water is being used for make-up water. Non-potable water can vary in constituents such as ammonia, phosphate, nitrates, conductivity, suspended solids, total organic carbon, biological and chemical oxygen demand, and micro-organisms. Examples of an adverse impact of potential constituents of non-potable makeup water upon a cooling water system include:

- ammonia can impact the ability of certain biocides to adequately inactivate micro-organisms;
- phosphates and nitrates can enhance biological growth potential; and
- elevated conductivity from higher chlorides or sulphates can increase corrosion rates.

Therefore the water treatment program must be specific to the quality of the makeup water, the operational characteristics, and the materials used in the construction of the components of the cooling water system. In other words the make-up water should be fit for the intended purpose within the cooling water system.

## 5.2 Maintenance and servicing of cooling water system by competent person

Maintenance and servicing of the cooling water system components is required to control the following *Legionella* critical risk factors:

- stagnant water;
- nutrient availability;
- poor water quality; and
- deficiencies in the cooling tower.

A competent person should be engaged by the owner or person in control to maintain and service the cooling water system on a regular basis<sup>6</sup>.

---

<sup>6</sup> However the Obligation under the Workplace Health and Safety Act for managing risks associated with the cooling tower still rests with the owner or person in control of the cooling tower and therefore contract management and supervision is critical to the success of such an arrangement.

Typically, such services are supplied by WTSPs and CSPs. It is good practice for the owner or person in control to be clear about the standard of maintenance required and for this to be specified in writing. This should be documented in a **Service Contract**.

Recommendations of what could be included in a service contract can be found in section 7 of this guide titled – Responsibilities of water treatment service providers.

### 5.2.1 Water treatment program for the cooling water system

A key objective of a cooling water system water treatment program is effective management of:

- corrosion;
- scaling;
- fouling; and
- microbial growth, including *Legionella*.

The specific water treatment program requirements should be determined by a risk assessment process. As such the requirements may vary in different types of cooling water systems. Therefore, a specific risk management plan should be documented for each system.

This Guide supports the use of a variety of techniques which would provide consistent and adequate treatment of cooling waters, so that the desired control over microorganisms, scale formation and corrosion is achieved, and all regulatory requirements are met.

Therefore, water treatment options can include both chemical and non-chemical.

Careful consideration should be given before choosing any water treatment products/procedures to ensure that such products/procedures have been tried and proven by the manufacturer to be effective<sup>7</sup>. The products/procedures should be suitable for local conditions.

Evidence of the effectiveness of such water treatment products/procedures should be based on continuous trials operating under field conditions and should be validated by independent laboratory<sup>8</sup> testing of the cooling system water in conjunction with various end users. These analytical tests need to be supported by physical examination and inspection of the cooling water system for evidence that critical risk factors such as stagnant water, nutrient availability, and poor water quality are being controlled. Such trials would

---

<sup>7</sup> The effectiveness of the product/procedure should be proven with a reputable clearly defined methodology that allows consistent, reliable and repeatable results to be achieved under controlled conditions that demonstrate clear biocidal activity against *Legionella pneumophila* and the other pathogens found in cooling water

<sup>8</sup>Laboratory shall have National Association of Testing Authorities accreditation for the water testing method

need to establish that the product/procedure is “tried and proven” and the respective claims made by the manufacturer/supplier have been substantiated.

The water treatment program should include the following:

- a suitable, continuous water treatment program for effective management of corrosion, scaling, fouling and microbial growth, including *Legionella*. It is recommended that the water treatment be automated<sup>9</sup>;
- provision of an effective biocidal concentration/dose/action level in the system at all times as verified in part by test results of microbial samples taken from the system;
- appropriate control of bleed-off rates suited to the system in use to prevent the build-up of solids. This is usually done by conductivity control (or Total Dissolved Solids) to ensure the correct cycles of concentration are obtained;
- biocidal processes selected to avoid problems associated with particular bacterium developing a tolerance to a particular biocide process. Therefore dual or alternating biocidal processes are recommended;
- where the water is being time dosed or slug dosed<sup>10</sup> with chemical biocides, the water treatment system should:
  - incorporate a lock out so that the bleed drain cannot operate while the system is being dosed with the biocide ;
  - incorporate an automated dosing device, ideally operating on residual chemical in the system;
  - include multiple biocides that are rotated periodically to avoid the bacteria developing a particular biocidal tolerance;
  - ensure that all chemicals used are compatible and that the desirable pH range for their optimal effectiveness is maintained.
- the control of corrosion and scale. The effectiveness of corrosion control could be monitored using corrosion coupons, or on-line corrosion monitoring;
- continuous monitoring of conductivity;
- regular monitoring of pH;

---

<sup>9</sup> Auto-dosing can be used to control pH, the concentration of biocide(s) and corrosion inhibitors. Such equipment is not fail-safe and must be regularly checked and properly maintained to ensure that the expectations of the water treatment program are achieved.

<sup>10</sup> The process of adding in a single dose a much higher amount of chemical biocide than is normally applied, with the intention of rapidly raising the concentration of the biocide in the water to a level expected to kill most if not all organisms in the water.

- monitoring of biocide concentration where practicable. Examples of where this is possible include chlorinated or brominated systems in conjunction with measurement of pH and ORP (oxidising-reduction potential);
- where the tower is exposed to significant environmental contamination, for example when construction activities are occurring in proximity to the cooling tower, the use of side stream filtration<sup>11</sup> to reduce the level of solids and improve water quality may be considered. Alternatively an increase in cleaning frequency may be warranted;
- where the tower system, or part of the system is idle, the risk of stagnant water should be minimised by the installation of a timer to the recirculating pump. This ensures that water (and chemicals such as biocide) circulates through the system which reduces the likelihood of biofilm and bacterial growth. If a system has been shut down for more than 30 days without any significant water or biocide circulation the system should be cleaned, and water treatment reinstated before it is restarted<sup>12</sup>;
- water in standby equipment such as pumps, and standby chillers should also be exposed to the water treatment program on a regular basis as determined by risk assessment. Where stand-by pumps are used the start sequence should be alternated. A risk assessment may determine a need for automatic sequencing of stand-by pumps on a regular basis (e.g. for a short period every 24 hours);
- dead legs<sup>13</sup> such as terminating pipe-work, chiller bypass lines, balance lines, and bypass lines should be located, then removed or activated by allowing treated water to flow continuously through the area;
- removal of inactive or redundant water treatment sensors;
- the use of a biodispersant to help break down the biofilm on the wetted surfaces in the tower system;
- protection of the tower basin from sunlight;
- selection of an appropriate point for biocide dosing;
- provision of a dedicated water sampling point – this can be the tower basin. However, sampling should not occur next to, or immediately

---

<sup>11</sup> Side stream filtration devices need regular maintenance and cleaning so as to minimise contamination and bacterial growth within the filtration device.

<sup>12</sup> This recommendation does not preclude cleaning and disinfection of a system before 30 days in the presence of critical risk factors such as excessive biofilm, algae, organic matter, dirt, or water of poor quality.

<sup>13</sup> A section of the system that does not permit the circulation of water.

downstream of, where make-up water or biocide is introduced into the system. Ideally the sampling point should be located off the return line to the cooling tower.

### 5.2.2 Routine servicing and inspection of a cooling tower

Inspection and servicing of the cooling tower and water treatment program should be carried out at least monthly<sup>14</sup> by a competent person, for example a Water Treatment Service Provider, who can make an assessment of whether the cooling water system is being maintained correctly.

This servicing should include:

- a visual inspection<sup>15</sup> of the cooling water system, including all wetted surfaces, drift eliminator, and tower basin for the presence of:
  - scale and particulate matter such as dirt, dust, insects, and leaves,
  - slime and microbial growth such as algae and fungi,
  - corrosion products;
- checking the clarity of the water;
- checking that the bleed-off system is functioning correctly and at the required rate;
- measurement of the conductivity of the system to ensure that adequate cycles of concentration are being used;
- checking that the water treatment system is functioning correctly, including:
  - all dosing and control equipment, for example sensors
  - timers, pumps, and tubing
  - checks on flow rate of dosing equipment
  - adequacy of supply of any chemicals being dosed;
- routine water analysis, for example as outlined in Table A;
- the calibration and inspection of water monitoring and dosing equipment;
- repair of obvious physical defects or damage, for example damage to drift eliminators;
- checking for correct placement of the drift eliminator;
- checking for changes in the local environment e.g. local building demolition or construction that may cause increased entrainment of particulate matter into the cooling tower;
- checking for leaks and unexplained water losses.

The results of the water service should be recorded. Any problems identified should be rectified immediately where appropriate and reported as soon as practicable to the owner or person in control of the cooling water system. The Water Treatment Service provider should also give written recommendations, including the time period required, for any corrective action.

---

<sup>14</sup> The risk assessment for the cooling tower may identify the need for more frequent servicing and inspection.

<sup>15</sup> Where the inspection task may result in exposure to aerosols the person should wear a P2 respirator at a minimum.

### **5.2.3 Routine servicing and inspection of the Chiller system**

In situations where the water from the cooling tower is pumped through a condenser, any heat exchange surfaces should be inspected for the presence of fouling and corrosion on a regular basis and cleaned. Fouling occurs from the build-up of scale, corrosion and biofilm. This biofilm can harbour bacteria and if dislodged could introduce bacteria into the cooling tower and recirculation water.

Scale/fouling can be controlled with an appropriate water treatment regime by the WTSP.

As it is usually a major exercise to inspect the tubes and water boxes of a condenser this is usually carried out on an annual basis by a competent person such as a Chiller Service Provider (CSP).

Chiller inspection and servicing may be performed by a CSP without experience in treating cooling tower water. Therefore, it is recommended that personnel from the WTSP be present during the inspection of the inside of the water boxes and tubes of the condenser vessel so that the WTSP and CSP people can work together to rectify any problems identified within the chiller.

In addition, to assist evaluation of the effectiveness of the water treatment program over time, it is recommended that photographs of the water boxes and tubes be taken and annotated with date and equipment identifier and included in the records of maintenance.

### **5.2.4 Routine cooling tower cleaning procedure**

Tower cleaning procedures should be documented for each cooling water system.

Physical and chemical cleaning (to a visual state of cleanliness) should be performed on a routine basis, and when required as identified by inspection of the cooling tower. Such cleaning includes removal of corrosion products, rust, scale, slime, sludge, mould, algae, biofilm and fungi. These pollutants are known to provide nutrients for the growth of micro-organisms such as *Legionella*.

The frequency of cooling tower cleaning maintenance programs should be determined by a risk management process. It is recommended, however that cooling tower systems undergo this cleaning process at least every six months.

Cooling towers may need to be cleaned more frequently and the frequency will be determined from the routine cooling tower inspections. The need to clean a cooling tower will depend upon factors such as the clarity of the water, the cleanliness of the towers, abnormal contamination of the cooling water system with dirt and dust from activities such as nearby construction, and the

results of water testing, including microbial testing (see section 5.2.6 for further information on microbial testing). The cleaning process should include the cleaning of all wet surfaces in the system and all off-line equipment where practicable.

A sample procedure for cleaning cooling towers and related equipment is included at Appendix 1 of this Guide. Because the cleaning of cooling towers is a high risk activity that generates aerosols that are potentially contaminated with *Legionella* bacteria, it is imperative that a competent person carry out the cleaning process using a cleaning process that meets (or exceeds) the standard outlined in the sample procedure.

Because such contaminated aerosols place persons cleaning the cooling tower and persons in the vicinity of the cooling tower at risk of exposure to *Legionella* bacteria, the sample cleaning procedure is designed to minimise such exposure.

Where it is impracticable to shut down a cooling water system for such periodic cleaning, for example as with large industrial cooling water systems serving power stations, co-generation plants and refining plants, *Australian/New Zealand Standard 3666.3* and *Australian Standard 5059* provide for a performance-based alternative based upon risk management principles.

### **5.2.5 Emergency disinfection and decontamination of the cooling water system**

Tables One and Two in Appendix Three indicate levels of bacteria at which disinfection or decontamination of the cooling water system is required. If analytical results of water sampling exceed these action levels the disinfection or decontamination procedures outlined in Appendix Four must be carried out to that standard or higher.

### **5.2.6 Heterotrophic colony count testing and Legionella testing**

The primary means for the control of *Legionella* bacteria is good hygiene practice for the cooling water system, as outlined above.

Monitoring of the cooling tower water for the presence of bacteria is an important tool in *verifying* if control strategies for the critical risk factors are effective. Such monitoring should include both:

- Heterotrophic Colony Count (HCC) which is an estimate of the number of viable units (expressed as colony forming units) of bacteria per millilitre of water using the pour plate, spread plate or membrane filter test. Also known as total bacteria count, total plate count or viable bacteria count test;
- *Legionella* Count which is an estimate of the number of viable units (expressed as colony forming units) of *Legionella pneumophila* and a

range of other *Legionella* species per millilitre of water using a test involving sample treatment followed by the spread plate technique.

Testing of bacterial levels in the recirculating water of a cooling tower system and appropriate corrective action should be a part of every cooling water system's regular service program.

Some guidance is provided below on the frequency of both Heterotrophic Colony Count (HCC) and *Legionella* testing. However it is essential that decisions on the frequency of such testing be based upon a risk assessment for each cooling water system. This risk assessment needs to assess the potential for growth of *Legionella* combined with the potential for exposure of people to aerosols from the system.

For example, where it is impracticable to shut down a cooling water system for periodic cleaning, such as with large industrial cooling water systems serving power stations, co-generation plants and refining plants, a risk assessment may indicate the need for such testing to be more frequent than that outlined in the general guidance below. This is in keeping with *Australian/New Zealand Standard 3666.3* and *Australian Standard 5059* which provide for a performance-based approach based upon risk management principles.

The frequency of both HCC and *Legionella* testing may be influenced by factors such as:

- a change to the water treatment program which would necessitate an increased frequency of testing to verify the effectiveness of the new program;
- recent elevated HCC and/or *Legionella* results which would necessitate an increased frequency of testing to verify if resultant changes to the water treatment system are effective;
- alterations and changes to the water cooling system including replacement of equipment.

There is no direct correlation between HCC levels and *Legionella* concentration. For example, it is possible to have very low HCC levels and still detect *Legionella* up to significant levels of concern.

Equally, it is possible to have very high HCC levels, but not detect *Legionella*. However, a high HCC level (greater than 100,000 CFU/mL) is an indicator that effective microbiological control is not being maintained and that the system may support *Legionella* growth unless action is taken to bring the system back under control.

It is difficult to use data specific to *Legionella* bacteria alone to control the microbial characteristics of a cooling water system because laboratory testing requires 7 to 10 days to obtain an analysis. Monitoring the overall bacterial level (HCC) in addition to the *Legionella* levels is recommended as it only takes several days after sampling for the HCC analytical data to be available.



Sampling points should be representative of the system and will usually be near the cooling tower, preferably off the return line to the cooling tower or, otherwise, up-stream of the chemical dosing points. Where there is more than one tower, a sample could be taken at each tower. This covers all 'openings' into the cooling water system and will assist in isolating problem areas. Sampling points should be labelled as "sampling points".

The testing of the water samples shall only be undertaken by laboratories accredited by NATA for technical competence in the performance of the bacterial analytical method. In choosing the laboratory, the WTSP should take account of the maximum delivery time between taking the sample and delivering it to the laboratory.

#### **5.2.6.1 Heterotrophic colony count**

Heterotrophic Colony Count (HCC) is used as a general indicator of water quality in cooling tower systems. The test measures the total bacterial load in the sample of water. It is reported as the number of colony forming units per millilitre (CFU/mL). HCC testing must be conducted at least monthly.

HCC test results indicate to those responsible for the system the extent of microbiological control over the cooling water system and, in particular, the potential of the system to promote bacterial growth, including *Legionella*.

However, reliance on HCC testing solely as an indicator of *Legionella* control is not recommended.

Guidance on water sampling for HCC analysis and analytical methodology is provided in Appendix Two.

AS/NZS 3666.3:2000 specifies a HCC of less than 100,000 CFU/mL as a test result not requiring additional control strategies. However effective control should result in much lower and consistent levels of HCC.

The action that should be taken for an elevated HCC is outlined in Table One of Appendix Three.

#### **5.2.6.2 Legionella testing**

Regular *Legionella* testing should be implemented as part of the water treatment management system. The frequency of testing should be based upon a risk assessment of the cooling water system. However a good starting frequency is testing every three months.

A risk management approach may also be considered when determining the frequency of *Legionella* testing. For example, more frequent testing could be considered as follows:

- in high risk areas such as hospitals and aged care facilities or areas with high numbers of people (e.g. central business districts, shopping centres);
- in large industrial type cooling water systems where periodic cleaning of the cooling water system is impracticable;
- periodically to evaluate the ongoing effectiveness of the cooling water system maintenance program;
- to evaluate the effectiveness of changes to the cooling water system maintenance program.

Guidance on *Legionella* sampling and testing methodology is provided in Appendix 2.

AS/NZS 3666.3:2000 specifies a *Legionella* level of not detected or less than 10 CFU/mL as a test result not requiring additional control strategies.

The action that should be taken for an elevated *Legionella* count is outlined in Table Two of Appendix Three.

### **5.3 Inspection of cooling water system by an on-site person**

Since the water treatment service provider generally visits the cooling tower at periodic intervals (typically a month), it is possible that a dosing/monitoring malfunction could occur that results in a significant deterioration in water quality well before the next inspection. To minimise this possibility, some simple inspections of the cooling water treatment system should be performed by an on-site person, for example a maintenance supervisor, or indeed, any delegated employee trained for this purpose. Where problems are noted, these need to be reported to a responsible person, who can then authorise remedial action.

Such inspections should aim to identify problems with the water treatment system for the cooling tower and may include:

- a check that any dosing devices are operating, for example, by observing if there are any alarm messages on the monitoring display;
- confirming that delivery tanks/containers contain sufficient volume of treatment chemical to last to the next inspection;
- confirming that the required volume of treatment chemical has been delivered from the reservoir container;
- confirming any float devices still contain treatment tablets.

The need to perform, and the frequency of, such inspections by an on-site person will be influenced by factors such as the frequency of inspections by the water treatment service provider (WTSP), and the type and sophistication of the water treatment delivery system which in turn will influence the likelihood of a delivery failure and should be determined by a risk assessment in consultation with the WTSP. For example where a float system<sup>16</sup> that

---

<sup>16</sup> Note – this is not a preferred or recommended water treatment delivery system

utilises biocide tablets that dissolve over time is used, there is a high likelihood that the biocide tablets will dissolve completely before the next WTSP inspection.

Such inspections should be formalised in a concise written procedure, with form fields to allow observations and actions to be recorded. A risk assessment<sup>17</sup> should be documented by the employer of the on-site person during the development of this procedure. Guidance and training should be sought from the water treatment service provider to cover minimum requirements for these inspections.

If such on-site inspections are not practicable, then consideration should be given to more frequent inspections of the water treatment system by the water treatment service provider, or the installation to the water treatment system of a remote alarm monitoring system.

#### **5.4 Access to and egress from an area containing a cooling tower**

The owner or person in control of the cooling water system should ensure safe access to cooling tower installations is maintained with appropriate fixed ladders, internal and external walkways, handrails, toe guards and platforms to facilitate the necessary inspection, maintenance and cleaning of the cooling tower/s.

People should be prevented from congregating<sup>18</sup> in the area around a cooling tower through the use of locked access doors or appropriately worded signage. Any persons accessing the area around the cooling tower should be required to wear a P2 respirator at a minimum. Signage requiring the use of a respirator should be placed at appropriate points around the cooling tower.

#### **5.5 Drift control**

Drift eliminators should be installed correctly and be maintained in an intact state. They must be tested and rated by the manufacturer to achieve 0.002% drift loss at the maximum design water circulation rate through the tower.

Drift eliminator panels must be fitted the correct way up. Also these panels must be fitted securely within the structure of the cooling tower so that exhaust air (and drift) cannot pass around the panels or through gaps between the panels.

#### **5.6 Chemical safety**

Material Safety Data Sheets should be obtained for each chemical and be readily available in the proximity to where the chemicals are being used and stored. Chemicals should be stored and handled with appropriate personal

---

<sup>17</sup> For example, where the inspection task may result in exposure to aerosols the person should wear a P2 respirator at a minimum

<sup>18</sup> It should be noted that smoking cigarettes presents as one of the highest risk factors for the contraction of Legionnaires' disease.

protective equipment, spill containment (for example, bunding) and cleanup equipment, incompatible chemicals should not be stored together, and appropriate chemical exposure controls should be implemented. Facilities/equipment for eye washing should be located near the point of chemical dosing.

## 6.0 Documentation and Reporting

To assist the record keeping process, the owner or person in control of the cooling water system should ensure each cooling tower is labelled with the cooling tower system (CTS) number provided on the registration certificate. Each cooling tower and chiller, moreover, should be labelled individually with a unique number. WTSPs and CSPs should, consequently, document the servicing, sampling, cleaning and testing results with the unique number/s for that system. This ensures proper communication of necessary corrective actions for each specific unit.

The owner or person in control of the cooling water system should ensure documented risk management information, including that listed below, is kept at the site of the cooling water system. This information should be immediately accessible to any service personnel and Workplace Health and Safety Inspectors, and should include:

- the documented risk assessment;
- the water treatment specifications<sup>19</sup>;
- planned service and maintenance requirements of cooling water system, including for the cooling tower and the condenser as outlined in a Service Contract;
- all results of water sampling and analysis<sup>20</sup>;
- key performance indicators and targets (see example below in Table A);
- current<sup>21</sup> material safety data sheets for any chemicals used in water treatment;
- water treatment dosing rates;
- water storage volumes for dosing calculations;
- tower cleaning procedures;
- disinfection/decontamination procedures;
- safe shut down and start up procedures;
- emergency contact details;
- service, inspection, corrective action, cleaning, disinfection, decontamination, microbial testing reports for the cooling water system, including the tower and the chiller condenser tubes and water vessels;
- results of microbial testing following corrective actions for adverse events;

---

<sup>19</sup> Ideally this record should detail the design basis for the water treatment program adopted for each cooling tower system, including the calculations done to determine appropriate dose rates or treatment levels, make-up water requirements and bleed rates. Analytical results used in these determinations must also be maintained. Where a cooling tower system has its treatment regime modified or changed as a result of unacceptable monitoring results, the design basis for these changes should be recorded and attached to the file for that system.

<sup>20</sup> NATA laboratory analytical data should be provided on the original NATA endorsed report.

<sup>21</sup> No older than 5 years.

- history of any previous action taken in response to significant KPI/target variations;
- records of the inspection of the cooling water system and water treatment system by on-site person/s.

## 6.1 Cooling Water System Service Reports

Service reports are the primary method of communication between the water treatment person and the cooling tower owner or person in control. These reports should include the outcomes of the regular service inspection and any other non-routine activities, and should include information on:

- date of service;
- name and signature of the service person;
- identification of the cooling water system component;
- type/make/model of cooling water system component;
- details of any visual inspection of the cooling water system, for example state of cleanliness of cooling tower, condition of drift eliminator, presence of water or chemical leaks, and checking of water treatment equipment, for example sensors and tubing;
- details of any actions, for example:
  - if any chemicals were added and in what volumes
  - whether the bleed-off rate was checked
  - whether the water treatment dosing rate was verified as correct
  - whether the tower/s were cleaned
  - verification of attainment of KPI's and targets
  - whether the cooling tower was tested for bacteria, and if so what tests were requested and what was the name of the laboratory used
  - repairs to equipment or plant;
- recommendations for corrective actions.

This service report should be signed by the customer or a representative of the site, at the time of the service visit (if available).

It is recommended that nominated key performance indicators, targets, and relevant corrective action/s for the cooling water system be recorded on the service reports – an example of such is provided in Table A.

The KPIs/Targets listed in this table are provided for guidance. The owner or person in control of the cooling water system in consultation with the WTSP or other competent person, should establish the KPIs and Targets for each cooling water system based upon local conditions that include the chemistry of the local make-up water and the characteristics of the cooling water system's operation, maintenance, and risk factors. It is imperative that the WTSP measures and records the KPIs/Targets during the regular inspection of the cooling water system.

Table A: Examples of Key Performance Indicators and Targets for cooling tower water

Test/observation	Key Performance Indicator and Target examples	Actual measurement/ observation results	Corrective action taken
<b>Key Performance Indicators</b>			
Heterotrophic Colony Count	< 100,000 cfu/mL		
<i>Legionella</i> species <sup>(a)</sup>	< 10 cfu/mL		
Scaling rate	Negligible scaling in cooling tower		
Dissolved iron	< 1 ppm		
Drift	<ul style="list-style-type: none"> <li>• No visible drift</li> <li>• Drift not felt when in proximity to cooling tower</li> </ul>		
Cleanliness of basin, interior of cooling tower, i.e. side walls, louvers, fill pack, drift eliminator panels, interior of fan cowling	<ul style="list-style-type: none"> <li>• Clean (no evidence of sludge)</li> <li>• Mildly Dirty (up to 3mm sludge)</li> <li>• Very Dirty (Extensive sludge, slime or algae, water murky)</li> </ul>		
Copper corrosion rates	< 0.005 mm/year		
Stainless steel corrosion rates	< 0.005 mm/year; with no pitting		
Mild Steel corrosion rate	< 0.15 mm/yr		
Drift eliminator	<ul style="list-style-type: none"> <li>• In correct position</li> <li>• Not damaged</li> <li>• Clean</li> </ul>		
<b>Targets</b>			
Total dissolved solids*	Vary according to local make-up water		
Conductivity*	Vary according to local make-up water		
Suspended solids	Vary according to local make-up water		
Calcium or total hardness*	Vary according to local make-up water		

Test/observation	Key Performance Indicator and Target examples	Actual measurement/ observation results	Corrective action taken
Chlorides*	Vary according to local make-up water		
pH* (for bromine compounds)	7 – 9		
pH* (for chlorine based compounds)	7 – 8		
Total alkalinity*	80 – 300 ppm		
Biodispersant	Dosed consistently at manufacturer's recommendations		
Corrosion inhibitor	Dosed consistently at manufacturer's recommendations		
Cycles of Concentration	For balancing water conservation and prevention of scaling – determined by calculating the ratios of TDS or conductivity between recirculating water and make-up water		
<p>(a) knowledge of the likelihood of <i>Legionella</i> levels being above the limit of analytical detection in makeup water is useful information as part of overall risk management.</p> <ul style="list-style-type: none"> <li>tests as marked with * should also be performed on the make-up water</li> </ul>			

## 6.2 Cleaning, disinfection, and decontamination reports

These reports should document that each of the steps in the cleaning, disinfection, and decontamination procedures (see Appendices One and Four respectively) were carried out. For example, documentation of the pH and frequency of testing of such, and concentration of biocide during cleaning, disinfection, decontamination of the cooling tower, verification of the integrity of the drift eliminator, etc as in the sample procedures outlined in Appendices One and Four.

## 6.3 Availability of records and reports

All records and reports as described in sections 6.1 and 6.2 should be made immediately available on request by a Workplace Health and Safety Inspector.

## 7.0 Responsibilities of Water Treatment Service Providers (WTSP)

The owner or person in control of a cooling water system may engage persons to assist in meeting their Obligation to ensure the cooling water

system is maintained in a condition that ensures that it is safe, and without risk to health, when used properly.

The owner or person in control of a cooling water system should make reference to the list of WTSP responsibilities as outlined below when choosing a WTSP and documenting a service contract.

Where the owner or person in control of a cooling water system has engaged a water treatment service provider to carry out the maintenance, servicing, cleaning, disinfection, and decontamination of a cooling water system, the *water treatment service provider has certain responsibilities*<sup>22</sup> including:

- Maintain the water in a cooling water system in accordance with the requirements of a Risk Management Plan (RMP), the service contract, and the relevant regulations and standards, on behalf of the client;
- Report cooling water system deficiencies beyond their control to the owner and/or appropriate “responsible person” for action as soon as is reasonably practicable, and to communicate the possible ramifications of inaction to the owner and/or “responsible person” (in some cases this may be via contractual arrangements and agreed communication protocols);
- The ability to respond efficiently to the corrective actions required following notification of an adverse microbiological test result;
- Take all reasonable steps to ensure that they deploy competent and appropriately experienced and qualified personnel to manage and/or maintain, service, clean, disinfect/decontaminate cooling tower systems on behalf of their clients;
- Comply with the relevant legal obligations for cooling tower maintenance in Queensland;
- Inform the cooling water system owner or person in control of all service actions, testing results and any defects observed in the system and develop an agreed communication protocol for each client;
- Where required seek funds from the cooling water system owner or person in control (or their delegated representative) to rectify reported system deficiencies. Communication should be as soon as is reasonably practicable and be expedited with suitable speed in proportion to the severity of the potential consequences of inaction;

---

<sup>22</sup> These responsibilities are similar to that suggested by other Australian government agencies, and as such the wording for these responsibilities has been based upon the Victorian Code of Practice for Water Treatment Service Providers. The Queensland Workplace Health and Safety Act 1995 does not make these responsibilities mandatory for the WTSP. The owner or person in control of the cooling water system has the Obligation under the Queensland Workplace Health and Safety Act to ensure the cooling water system is safe.



- Maintain a cooling water system's water quality such that the performance, efficiency and expected lifetime of operation of the system is maintained within acceptable limits;
- Ensure that water samples are taken from appropriately designated and identified sampling points in the cooling water system at appropriate intervals, and delivered to laboratories accredited by NATA for technical competence in the performance of the relevant methods so that testing can be conducted within reasonable timelines;
- On becoming aware that a cooling tower is not registered, advise the responsible person to register the cooling tower with the Department of Employment and Industrial Relations;
- Where continued inaction to rectify a deficient cooling tower system by the system owner or person in control or their delegated representative results in a potentially significant risk to occupational and/or public health, advise the relevant person in writing of the risk to health;
- Have contingency plans in place to ensure compliance with legislation in the event of notification of adverse events and water sampling results and subsequent remedial actions;
- Test and record chemical, microbiological, and physical parameters as required, to ensure that the treatment regime adopted for a cooling water system is being maintained within defined limits;
- Use appropriate chemicals at effective concentrations, as stated in the manufacturer's specifications, for the maintenance of the desired water quality within a cooling tower system;
- Ensure that where non-chemical water treatment is utilised for microbial control within a cooling water system, they are proven effective and fit for purpose, and that remedial chemical treatment is readily available if an adverse event occurs;
- Where possible, use auto-dosing equipment (or equivalent) for the maintenance of microbial control and, where possible, auto-bleed equipment (or equivalent) for the maintenance of water quality;
- Maintain records of maintenance, servicing, cleaning, and disinfection/decontamination. These records should be completed immediately upon completion of these activities. See also section 6 of this Guide for further information on Documentation;
- Abide by all relevant occupational health and safety requirements on site, and work in a safe manner as directed by the WTSP's and/or client's health and safety management plan;

- Where changes to chemicals occur or changes to MSDS occur, ensure that current sheets are provided and superseded ones are removed. The MSDS should be located in close proximity to the chemicals;
- Ensure that all chemical containers left on-site are appropriately stored and labeled;
- Ensure that spill containment and cleanup facilities are available for chemicals;
- Have contracts with clients that clearly indicate the respective responsibilities of each party.

## **8.0 Evaluation of cooling water system maintenance program**

Where a Water Treatment Service Provider is contracted to maintain a cooling tower system on behalf of the owner or person in control, this contractual arrangement does not absolve the owner or person in control from their Obligation to ensure the cooling water system is maintained in a condition that ensures it is safe.

Therefore, the owner or person in control of the cooling water system should have in place a means of evaluating the effectiveness of the service provided by the WTSP and CSP.

Such an evaluation could include:

- a review of the procedures that are in place to manage the critical risk factors – a competent auditor who is independent of the water treatment provider could be engaged to assist with this, or the owner or person in control could conduct this review themselves;
- a review of achievement of the key performance indicators (KPI's) and targets for the maintenance of the cooling water system. For example the owner of the cooling water system or person in control could specify that the WTSP achieve at least 90% compliance against the KPI's per year;
- a review of the inspection, maintenance, service, and cleaning records and compare with what was specified in the written service contract;
- a review of the completion of required corrective actions to the cooling water system;
- a review of the standard of the written records of service and maintenance;
- independent microbial sampling and testing of cooling tower waters. Sampling is usually undertaken by the WTSP as part of the range of professional services offered to the client. There may be special circumstances whereby regular or random independent sampling<sup>23</sup> is highly desirable, in order to avoid potential allegations of a conflict of interest, and/or to reassure the client, workers and/or the public about a system's performance;

---

<sup>23</sup> It is important to ensure that sampling and analytical methods are the same as that routinely used for the cooling tower water.

- a visual inspection of the cooling tower and condenser by the owner or person in control during the WTSP and CSP routine inspection of the cooling tower and condenser to verify the cleanliness and condition of the plant;
- an evaluation of trends from water testing by the cooling water system owner or person in control.

## **9.0 Occupational Health and Safety for Water Treatment Service Providers and Chiller Service Providers**

The Water Treatment Service Provider (WTSP) and Chiller Service Provider (CSP) have a legal obligation under the *Workplace Health and Safety Act 1995* to ensure the workplace health and safety of all persons engaged as part of their business activities or undertaking. This includes independent contractors engaged by the WTSP or CSP.

The servicing of cooling tower systems by WTSPs can potentially expose service technicians to a number of potential hazards, for which procedures and practices to manage such risks must be in place. Appendix 6 of this Guide provides guidance on the management of workplace health and safety risks for Water Service Treatment Providers.

## **10 Risk management of bleed water reuse**

Drought conditions and changes to the Plumbing and Drainage Act in 2007 have increased the likelihood of cooling tower bleed water being reused at workplaces for purposes such as toilet flushing, landscape irrigation, and cooling tower makeup water. The owner or person in control of a cooling tower has an obligation under the WHS Act to control risks arising from the storage and use of the bleed water. The reuse of bleed water should comply with the risk management process outlined in Appendix 8 of this guide. Owners or person in control of a cooling tower for which bleed water is being stored and/or reused should also refer to the *Guide to the workplace use of non-potable water, including recycled waters*.

Bleed water from cooling towers can contain a range of contaminants including micro-organisms and chemicals used in the cooling tower water treatment program. These hazards can, if present in sufficient quantities in the bleed water storage system, cause a risk to people if not controlled and if people are exposed to the water for example by inhalation via aerosolisation, and direct skin contact with the water.

If bleed water is to be reused the presence of *Legionella sp.* in the bleed water, the opportunity for *Legionella sp.* to proliferate in bleed water storage and distribution systems, and the risk of exposure of people to chemicals in the bleed water must be controlled.

Before bleed water from a cooling tower can be stored and reused for other purposes the presence of *Legionella sp.* in the cooling tower must be controlled by compliance with the requirements of this *Guide to Legionella*

*Control in Cooling Water Systems, including Cooling Towers*, or a higher risk management process.

Bleed water from a cooling tower will contain residual chemicals from the tower chemical water treatment program. With biocides such as isothiazolone and glutaraldehyde, which are skin and respiratory sensitisers, this bleed water should not be reused unless it can be demonstrated that the workplace use of the bleed water will not expose people to these chemicals.

Guidance on a risk management system for a bleed water storage and distribution system is outlined in Appendix 8. Forms to assist with the implementation of a risk management process and the documentation of such can be found in the *Risk Management Code of Practice*.

## Appendix One

### Sample procedure for cleaning cooling towers and related equipment

Below is a sample procedure for cleaning cooling towers and related equipment. The process involves four steps:

- Step 1** - before chemical disinfection and mechanical cleaning;
- Step 2** - chemical disinfection;
- Step 3** - mechanical cleaning; and
- Step 4** - after mechanical cleaning.

The actual procedure used may be varied to suit the particular situation. However it is recommended the procedure generally covers the following criteria.

#### Step 1: before chemical disinfection and mechanical cleaning

Provide protective equipment to workers who perform the disinfection, to prevent their exposure to:

- chemicals used for disinfection; and
- aerosolised water and biofilm that may contain *Legionella* bacteria.

Protective equipment should include full-length protective clothing, boots, impervious gloves, goggles, and a full or half-face respirator that combines a high efficiency particulate air filter of at least a P2 class (for filtering of aerosols) and a chemical cartridge filter of type B Aus or B1 (for filtering of disinfection chemicals) [for more information see *Australian/New Zealand Standard 1715 – Selection, Use and Maintenance of Respiratory Protective Devices*]. The person wearing the respirator should be clean shaven to maximise the seal between the respirator and face, and should be fit tested for the respirator and trained to fit check the respirator prior to each use.

It is important also to limit exposure of other people in the vicinity of water spray or debris.

Ensure that proper means of access are available and safe means of working at heights are ensured through appropriate equipment and training of the workers.

Use correct shutdown procedures:

- shut off and isolate heat load source (e.g. chiller, process plant);
- shut off and isolate cooling tower/evaporative condenser fans;
- shut off the system blow-down (purge) valve, shut off automated blow-down controller, if present, and set system controller to manual;
- keep make-up water valves open; and
- continue operating all water circulation pumps required to circulate water through all areas of the cooling system, including all standby chillers, pumps, balance lines and dead legs.

## Step 2: chemical disinfection

- Add either a low foaming chlorine-compatible biodispersant or low foaming bromine-compatible biodispersant to the recirculating system;
- Add chlorine-based compound to achieve free residual chlorine (FRC) level of at least 5 to 10 mg/L<sup>24</sup>. Then maintain the FRC at not less than 5 to 10 mg/L whilst continuously circulating the water through the system for a period of one hour, maintaining the pH of the water between 7.0 and 7.6. Measure and record the FRC and pH at 15-minute intervals on the tower clean service report; OR
- Add a bromine-based compound to achieve a free residual bromine (FRB) level of at least 20 mg/L<sup>25</sup>. Then maintain the FRB at not less than 20 mg/L whilst continuously circulating the water through the system for a period of one hour, maintaining the pH of the water between 7.0 and 8.5; Measure and record the FRB and pH at 15-minute intervals on the tower clean service report;
- Some installations such as Multistack chillers need an alternative biocide to bromine or chlorine. Therefore an option is for the use of a biodispersant and fast acting non-oxidising biocide dosed in accordance with the manufacturer's instructions;
- During recirculation, a bleed off rate should be used to facilitate the removal of suspended particulate matter from the system. Ensure a controlled make-up flow so that all the system is adequately wetted. Flush all dead legs including sample line, pressure transmitters etc;
- Record the type and quantity of all chemicals used for disinfection and the time of the results of measurements of FRC or FRB and pH.

## Step 3: mechanical cleaning

- Shutdown and isolate the water circulation pumps. Isolate incoming make-up streams and drain the cooling tower to waste in accordance with the local water authority<sup>26</sup>;
- Inspect all water contact areas for sediment, sludge and scale. Use brushes and a water hose or high pressure water cleaner to thoroughly clean the drift eliminators and fan inlet screens. Check that the drift eliminators are not damaged by the high pressure water;
- Likewise, clean all of the cooling tower water contact areas including the basin, sump, fill, spray nozzles and fittings, drift eliminators, side stream filtration, and air intake louvres. In cooling towers where the fill pack and/or drift eliminators are easily removed, these should be removed to facilitate cleaning;

---

<sup>24</sup> The choice of 5 or 10 mg/L will be dependent upon factors such as the size or fabrication material of the cooling water system. For example with large industrial cooling towers the volume of water may make it impractical to maintain a FRC of 10 mg/L and therefore 5 mg/L over a longer period of time may be practicable.

<sup>25</sup> Again in large industrial cooling towers the volume of water may mean it is practical to maintain a lower FBR.

<sup>26</sup> In order to conserve water and in situations where there is little or no suspended solids, it may be possible to filter and treat the water and hold it in a tank, and once the tower has been cleaned reuse the water to fill a percentage of the tower basin.

- If possible, clean the cooling tower/evaporative condenser contact areas within the chillers;
- Ensure all loose deposits are removed from the sump and cooling tower basin. The use of a wet vacuum cleaner may make it easier to remove waste material from the basin floor;
- Reassemble all components and hose with clean water. If drift eliminators are moved, ensure that they are correctly installed on replacement.

#### **Step 4: after mechanical cleaning**

- Fill the cooling tower/evaporative condenser with water and switch on the recirculating pump.
- If the water is not visually clear, repeat steps 2 and 3 where necessary. Clean the water filters, strainers and repeat steps 2, 3, and 4 until the water quality is satisfactory. Side stream filtration can be used to facilitate removal of suspended matter and help minimise water being dumped.
- “Slug dose” the cooling water system with water treatment chemical/s at appropriate concentration.
- To reduce the risk of corrosion it may be necessary to neutralise excessive chlorine levels in the cooling system once cleaning has been completed<sup>27</sup>. Alternatively a decision might be made to allow the free chlorine levels to decay naturally, and therefore the corrosion inhibitor levels should be increased during these procedures to offer additional protection against any corrosion that could occur.
- Immediately reinstate comprehensive effective water treatment including biocide(s), corrosion inhibitors, and scale control.
- Record all actions in operations and maintenance logbook or cleaning report.

**If the system is shut down for more than 30 days it should be cleaned and disinfected before it is restarted<sup>28</sup>.**

---

<sup>27</sup> The choice of neutralising agent, for example sodium thiosulphate or sodium metabisulphite, will depend upon factors such as the hardness of the water, whether maintenance of a residual of some free chlorine will be beneficial in controlling any microbes that could emerge during/following the process of cleaning as biofilm or dirt may not be all immediately removed during cleaning, and whether the neutralising agent contains residual sulphite or bisulphite in sufficient concentrations that may be detrimental to isothiazolinone stability.

<sup>28</sup> This recommendation does not preclude cleaning and disinfection of a system before 30 days in the presence of critical risk factors such as excessive biofilm, algae, organic matter, dirt, or water of poor quality.

## Appendix Two: Bacterial Sampling and Testing Methods

Water samples should be taken from the same point in the cooling tower. It is recommended that samples be taken from the condenser water return to the cooling tower and whilst the system is in operation.

Avoid sampling for at least 72 hours after system operation following disinfection, slug dosing with biocide, decontamination or cleaning procedures to allow conditions to stabilise.

The size of each water sample should be at least 100mL.

Refer also Appendix A of AS/NZS 3666.3.

Personal Protective Equipment appropriate to the sampling procedure shall be worn during the sampling. For example this should include gloves and respirator if sampling directly from the tower basin.

### HCC testing method

It is recommended samples of the recirculating water be tested and analysed for HCC as follows:

- Sampled for HCC in accordance with *Australian/New Zealand Standard 3666.3: Air-handling and water systems of buildings - Microbial control - Performance-based maintenance of cooling water systems*.
- Taken in containers as described in *Australian/New Zealand Standard 2031: Selection of containers and preservation of water samples for microbiological analysis*. This describes the selection of suitable sample containers and preservation of the sample for later testing. This involves the sample being stored at between 2°C and 10°C prior to analysis.
- Analysis commenced within 24 hours of the sample being taken<sup>29</sup>. It is preferable for analysis of the sample to be within 6 hours.
- Analysed using a laboratory accredited by the National Association of Testing Authorities (NATA)<sup>30</sup> to perform the method: *Australian/New Zealand Standard 4276.3.2 Water microbiology - Heterotrophic colony count methods – Plate count of water containing biocides*. If another method that is *specifically* equivalent to this method is used, then the laboratory should be accredited by NATA for technical competence in the performance of the method.
- The same method should be used for all samples from the same cooling water system so that method derived variance can be excluded when comparing results over time from the same cooling tower<sup>31</sup>.

---

<sup>29</sup> Note – in some more remote areas it is not always possible to achieve this objective but it must still be achieved in the least practicable time. Where it is not possible contact should be made with the testing laboratory to determine the best possible method.

<sup>30</sup> The use of a NATA accredited laboratory accredited for the performance of the method is strongly recommended.

<sup>31</sup> It is difficult to determine equivalence between permissible testing methods. Two methods can produce different results as a result of variations in the methods themselves.



**HCC samples should be taken and analysed on a monthly basis. If the HCC level is above 100,000 CFU/mL, undertake the correct control strategy as described in Table 1 of Appendix 3. This includes re-sampling allowing at least 72 hours after corrective actions have been completed.**

### ***Legionella* testing method**

It is recommended samples of the recirculating water be tested and analysed for *Legionella* as follows:

- Sampled for *Legionella* in accordance with *Australian/New Zealand Standard 3666.3: Air-handling and water systems of buildings - Microbial control - Performance-based maintenance of cooling water systems*.
- Taken in containers as described in *Australian/New Zealand Standard 2031: Selection of containers and preservation of water samples for microbiological analysis*. This describes the selection of suitable sample containers and preservation of the sample for later testing. This involves the sample being stored at between 2°C and 10°C prior to analysis.
- Analysis commenced preferably within 24 hours of the sample being taken.
- Analysed using a laboratory accredited by the National Association of Testing Authorities (NATA)<sup>32</sup> to perform the method: *Australian/New Zealand Standard 3896:1998 - Waters – Examination for Legionellae including Legionella pneumophila*. If another method that is *specifically* equivalent to this method is used, then the laboratory should be accredited by NATA for technical competence in the performance of the method.
- The same method should be used for all samples from the same cooling water system so that method derived variance can be excluded when comparing results over time from the same cooling tower<sup>33</sup>.

**Legionella samples should be taken and analysed at least three monthly. If the Legionella level is 10 CFU/mL or greater, undertake the correct control strategy as described in Table 2 of Appendix 3. This includes re-sampling, allowing at least 72 hours after corrective actions have been completed.**

---

<sup>32</sup> The use of a NATA accredited laboratory accredited for the performance of the method is strongly recommended.

<sup>33</sup> It is difficult to determine equivalence between permissible testing methods. Two methods can produce different results as a result of variations in the methods themselves.

## Appendix Three

### Control strategies for presence of *Legionella* and other heterotrophic micro-organisms

The following tables 1 and 2 (adapted from *Australian/New Zealand Standard 3666.3:2002*) detail the recommended actions to be taken as part of the control strategies based upon HCC or *Legionella* concentrations respectively in the recirculating waters.

#### Treatment in cooling towers

Where indicated in Tables 1 and 2, on-line disinfection and decontamination should be carried out as described in Appendix Four.

**Table 1**

<b>CONTROL STRATEGIES FOR THE PRESENCE OF OTHER HETEROTROPHIC MICROORGANISMS</b>	
Test result (cfu/mL)	Required control strategy
<100 000	(1) Maintain monthly monitoring Maintain water treatment program
≥100 000 <5 000 000	(2) Investigate problem Review water treatment program Take necessary remedial action including immediate disinfection as described in this guide and undertake control strategy (3) (3) Retest water within 3 to 7 days of plant operation (a) If test result is <100 000 cfu/mL repeat control strategy (1) (b) If test result is ≥100 000 cfu/mL but <5 000 000 cfu/mL undertake control strategy (2) (c) If test result is ≥5 000 000 cfu/mL undertake control strategy (4)
≥5 000 000	(4) Investigate problem Review water treatment program Take necessary remedial action including immediate disinfection as described in this guide and undertake control strategy (5) (5) Retest water within 3 to 7 days of plant operation (a) If test result is <100 000 cfu/mL repeat control strategy (1) (b) If test result is ≥100 000 cfu/mL but <5 000 000 cfu/mL repeat control strategy (4) (c) If test result is ≥ 5 000 000 cfu/mL investigate problem and review water treatment program, carry out immediate decontamination as described in this guide.

Source: adapted from *Australian/New Zealand Standard 3666.3:2002*

**Table 2**

<b>CONTROL STRATEGIES FOR THE PRESENCE OF LEGIONELLAE</b>	
Test result (cfu/mL)	Required control strategy
Not detected (<10)	(1) Maintain frequency of monitoring as determined by the risk assessment. Maintain water treatment program
Detected as <1000	(2) Investigate problem Review water treatment program Take necessary remedial action including immediate disinfection as described in this guide and undertake control strategy (3)
	(3) Retest water within 3 to 7 days of plant operation (a) If not detected, continue to retest water every 3 to 7 days until two consecutive samples return readings of not detected and repeat control strategy (1) (b) If detected at <100 cfu/mL repeat control strategy (2) (c) If detected at $\geq 100$ and <1000 cfu/mL investigate problem and review water treatment program, immediately carry out decontamination as described in this guide and repeat control strategy (3) (d) If detected at $\geq 1000$ cfu/mL undertake control strategy (4)
Detected as $\geq 1000$	(4) Investigate problem Review water treatment program Take necessary remedial action including immediate system decontamination as described in this guide and undertake control strategy (5)
	(5) Retest water within 3 to 7 days of plant operation (a) If not detected, continue to retest water every 3 to 7 days until two consecutive samples return readings of not detected and repeat control strategy (1) (b) If detected at <100 cfu/mL repeat control strategy (2) (c) If detected at $\geq 100$ and <1000 cfu/mL investigate problem and review water treatment program, immediately carry out decontamination as described in this guide and repeat control strategy (5)
	(d) If detected at $\geq 1000$ cfu/mL investigate and review water treatment program, immediately carry out system decontamination as described in this guide and repeat control strategy (5)

Source: adapted from Australian/New Zealand Standard 3666.3:2002

## **Appendix Four: Emergency disinfection and decontamination procedures**

### **Disinfection**

The following process is recommended for disinfection of cooling water systems:

1. Follow all relevant workplace health and safety procedures, including the use of personal protective equipment<sup>34</sup>;
2. Cease any water treatment program. Isolate any electrical equipment except the water treatment pump;
3. Add a low foaming chlorine-compatible biodispersant or low-foaming bromine-compatible biodispersant to the recirculating water;
4. Disinfect the system by dosing the water with a biocide, either:
  - a chlorine-based compound (with detergent properties), equivalent to at least 10mg/L of free chlorine for at least one hour, while maintaining the pH of the water between 7.0 and 7.6; or
  - a bromine-based compound (with detergent properties), equivalent to at least 20mg/L of free bromine for at least one hour, while maintaining the pH of the water between 7.0 and 8.5;
5. Review the water treatment program, tower operations and maintenance program;
6. Correct any faults and implement any necessary changes;
7. Record all actions and observations in the maintenance report;
8. Recommission and repassivate the circulating cooling water system, and reinstate the water treatment program.

### **Decontamination**

The following process is recommended for decontamination of cooling water systems:

1. Follow all relevant workplace health and safety procedures, including the use of personal protective equipment<sup>35</sup>;
2. Isolate any cooling tower fans to prevent operation;
3. Add a low foaming chlorine-compatible biodispersant or low-foaming bromine-compatible biodispersant to the recirculating water;
4. Dose the circulating cooling water system with a biocide, either:
  - a chlorine-based compound, equivalent to at least 10mg/L of free chlorine for at least one hour, while maintaining the pH of the water between 7.0 and 7.6; or
  - a bromine-based compound (with detergent properties), equivalent to at least 20mg/L of free bromine for at least one hour, while maintaining the pH of the water between 7.0 and 8.5;

---

<sup>34</sup> See Appendix One, Step One for information on minimum PPE required

<sup>35</sup> See Appendix One, Step One for information on minimum PPE required

- Add the disinfectant slowly, over five to ten minutes, to a turbulent zone of the tower basin to promote its rapid dispersion. Use an antifoaming agent if excessive foaming occurs;
  - Circulate the system for 1 hour, measure the pH and free chlorine or bromine levels regularly (i.e. every 15 minutes) and adjust as required and record levels and actions in appropriate written record;
  - Ensure that the water is circulated through all parts of the system, including the standby condenser pump and any chillers that may currently be off line;
5. Switch off equipment and drain the cooling tower to waste in a manner approved by the local water authority. The cooling tower should be drained<sup>36</sup>. The use of a wet vacuum cleaner can make it easier to remove waste material from the basin floor;
  6. Refill with clean water and switch on the recirculating pump;
  7. Repeat step 4. Then switch off the recirculating pump. Drain cooling tower system to waste in a manner approved by the local water authority;
  8. Inspect the drift eliminators and clean, repair or replace as necessary. If the eliminators are moved, ensure they are correctly installed on replacement. Suitable precautions should be taken to minimise the release of aerosols during cleaning operations;
  9. Thoroughly clean the internal shell, fill and tower sump by brushing and gently hosing all surfaces. Remove all debris. Avoid damage to the tower and accessories during this operation;
  10. Thoroughly internally clean all water filters, strainers, separators, water nozzles and fittings associated with the water distribution system paying particular attention to the tower fill and distribution trays;
  11. Re-assemble all components and hose with clean water;
  12. Repeat step 4. Then switch off the recirculating pump. Drain cooling tower system to waste in a manner approved by the local water authority;
  13. Refill with clean water and switch on the recirculating pump;
  14. Repeat step 4 and then step 13 if the water is not visually clear. Clean the water filters, strainers and repeat step 13. Repeat this sequence until the water quality is satisfactory;
  15. Immediately reinstate comprehensive effective water treatment including biocide(s), corrosion inhibitors and scale control;
  16. Record all actions in appropriate written record.

---

<sup>36</sup> Where this is not practicable, a very high bleed off rate should be used during step 4 while still maintaining free disinfection concentration. This will facilitate removal of suspended particulate matter from the system and the partial replacement of cooling water with clean make-up water.

## Appendix Five

### Legionella and Legionnaires' disease

#### What is *Legionella*?

*Legionella* bacteria are micro-organisms that can cause a serious infection in humans. It can cause infection called legionellosis, which can take two forms: Legionnaires' disease and Pontiac fever.

Legionnaires' disease is an infection that presents as a type of pneumonia (lung infection) that can be severe and even life threatening. Pontiac fever is a milder form of respiratory illness.

#### Risk factors causing disease

*Legionella* bacteria occur naturally in the environment, in both water and soil. Artificial water systems may provide environments that allow *Legionella* bacteria to multiply in large numbers. Examples of relevant systems include evaporative coolers, closed circuit fluid coolers, evaporative condensers and cooling towers.

Warm water systems (including showers), spa pools, fountains, warm water storage systems, and potting mixes and compost may also provide an environment that allow bacteria to multiply but such risks are not covered by this guide.

The main risk factors for an outbreak of the disease caused by cooling water systems are:

- the presence of *Legionella* bacteria;
- conditions suitable for multiplication of the organisms: suitable temperature (20°C to 45°C) and a source of nutrients such as sludge, scale, rust, algae and other organic matter;
- a means of creating and spreading breathable droplets, such as the aerosol generated by a cooling tower; and
- exposure of susceptible people to these aerosols.

#### The effect of aerosols on humans

Water contaminated with *Legionella*, particularly the bacterium of the *Legionella* species *Legionella pneumophila*, such as could occur in a cooling tower, presents a risk to health when the water from the tower is dispersed into the air as an aerosol and transported by natural and mechanical air currents. It may be inhaled by passers-by, or the aerosol may enter doors, windows, and air intake ducting of buildings where humans can then inhale it.

The elderly, smokers, and those individuals with impaired immunity are more likely to develop infection from highly contaminated aerosol. In Australia, the major outbreaks of Legionnaires' disease have been traced to contaminated

water of cooling towers and evaporative condensers associated with a cooling water system. A small number of cases have been associated with warm water services, and spa pools.

Evaporative coolers have less potential for similar infections. However, any sump water should be dumped and replaced with fresh water before the start-up of these units if there has been a significant period over which the recirculation system has been shut down. Owners or person in control of such plant will find useful information in the references of this guide.

Appendix Seven contains information on the “Requirement to report legionellosis, and the role of Queensland Health and Workplace Health and Safety Queensland”.

## **Appendix Six**

### **Occupational Health and Safety for Water Treatment Service Providers**

All cooling tower systems that are to be serviced by a WTSP should have had an inspection conducted prior to undertaking such work, to investigate and anticipate any occupational health and safety issues that may be associated with servicing the system(s) in question.

Those occupational health and safety issues can include:

- Potential exposure to Legionella bacteria;
- Potential exposure to chemicals;
- Potential exposure to electromagnetic radiation from nearby communication transceivers;
- Access/Egress and Working at Heights;
- Confined Spaces;
- Climatic Considerations;
- Electrical Safety; and
- Manual Handling.

Where a cooling tower system presents unacceptable occupational health and safety risks beyond the control of the WTSP, such as access/egress issues, the client should be informed that servicing will be based on acceptable standards being met. Such safety requirements should be incorporated into the contract between the WTSP and the client.



## Appendix Seven

### Requirement to report legionellosis, and the role of Queensland Health and Workplace Health and Safety Queensland

This section provides guidance for the actions to be taken in the event that legionellosis is detected in a person, that is, a person is actually infected.

NOTE – a water sample from a cooling water system that tests positive to the presence of bacteria (HCC) or *Legionella* is not applicable to this section.

Legionellosis is a term that includes both Legionnaires' disease and Pontiac fever.

In the first instance, a diagnosis of legionellosis is notifiable to Queensland Health; and then only to Workplace Health and Safety Queensland if the source of the legionellosis is shown to have been associated with a workplace and/or cooling water system as explained below.

Legionellosis is a notifiable condition, required to be notified to Queensland Health by pathology laboratories on definitive or suggestive evidence.

On receiving a legionellosis notification, the local Queensland Health Regional Population Health Unit is responsible for investigating the case. This investigation includes ensuring identification of the organism where possible and tracing movements of the affected person in the two weeks prior to illness.

History taking includes hospitalisation, travel and exposure to cooling towers and other aerosolised water sources. The affected person's domestic hot water system temperature is also inquired about. If the affected person lives or works near a cooling tower, examination of the maintenance records of the system will be considered.

More detailed investigations will be considered if there are two or more ill people linked in time and place, infected with the same serotype (if known), or if an ill person spent the full 10-day incubation period in hospital or spent part of the incubation period in a hospital where cases of Legionnaires' disease had occurred previously.

Where a Queensland Health investigation raises suspicion that a specific workplace or cooling water system is the source of legionellosis, it is expected that Queensland Health will notify the Occupational Health Unit of Workplace Health and Safety Queensland. Workplace Health and Safety Queensland may conduct its own investigation of the workplace and the cooling water system. Inspectors may then direct the owner or person in control of the cooling water system to take certain actions to minimise legionellosis risk.

Therefore, there is no requirement for persons conducting a business or undertaking to notify Workplace Health and Safety Queensland of any person at their workplace becoming ill with a legionellosis *until* there is evidence that the cooling water system (or other source) at their workplace was the source of the legionellosis. Likewise, there is no requirement for persons at a workplace to notify Workplace Health and Safety Queensland (or Queensland Health) of any elevated water sample bacterial counts, including detection of

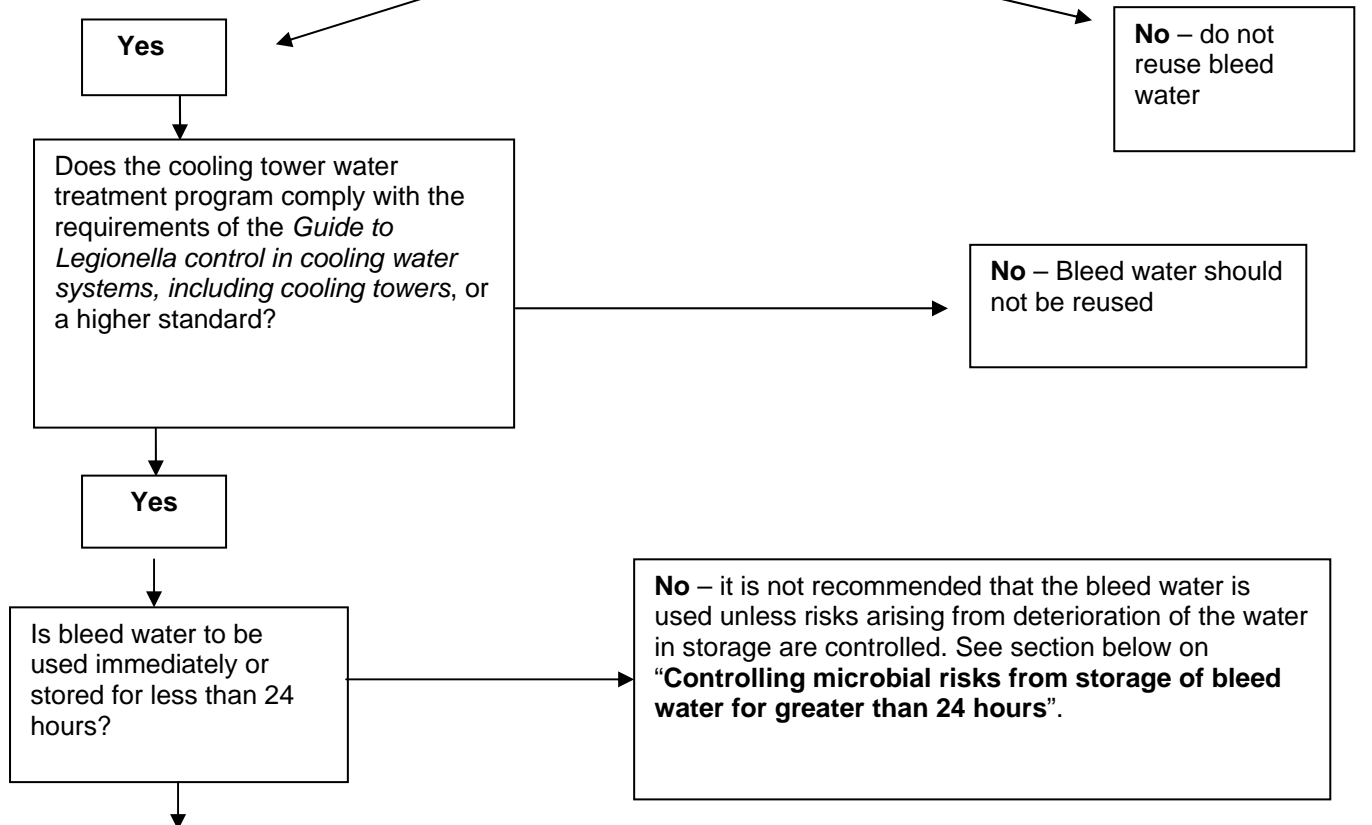
*Legionella* from a cooling water system. Rather, the owner or person in control of the cooling water system should follow the recommended cleaning, disinfection, or decontamination processes outlined above in this Guide.

Further information on Legionnaires' disease can be found in the Queensland Health Fact Sheet on Legionnaires' disease at <http://www.health.qld.gov.au>.

## Appendix Eight

### Risk Management and Water Quality Standard for the Reuse of Bleed/Blowdown Water from Cooling Towers

Has a risk assessment to determine if the use of the bleed water is “fit for purpose” been conducted as outlined in the *Guide to workplace use of non-potable water, including recycled waters*?



**Yes** – water can be reused. The following should be in place:

- Evidence of compliance with cooling tower risk management including all records of inspection, water treatment, water sampling, and an audit of the cooling tower *Legionella* risk management program on at least a yearly basis;
- The bleed water is filtered as it leaves the cooling tower so as to remove potential nutrient sources for micro-organisms during storage circumstances;
- The bleed water is disinfected prior to use – the use of a disinfection tank is recommended so as there is sufficient contact time with any biocide;
- The bleed water is used immediately or within 24 hours;
- The bleed water discharges automatically to sewer if not used within 24 hours;
- The water must be used in a manner that minimises aerosolisation, skin contact, and ingestion;
- Any tanks (e.g. disinfection tank) should be designed so as visual inspection (and cleaning as required) of the wetted surfaces can occur at least yearly;
- Tanks should be situated so they are not in direct sunlight;
- If *Legionella sp.* are detected in cooling tower at levels > 10 CFU/mL the supply of bleed water to the storage/reuse system shall cease until the levels in the cooling tower are controlled below 10 CFU/mL;
- If the Heterotrophic Colony Count in the cooling tower is > 100,000 CFU/mL the supply of bleed water to the storage/reuse system shall cease until the levels in the cooling tower are controlled below 100,000 CFU/mL;
- HCC and *Legionella* sampling (and intervention arising from sampling results) of the water in the disinfection tanks should occur as outlined below in the section on **Controlling microbial risks from storage of bleed water for greater than 24 hours**;
- As part of your risk assessment and before implementing your bleed water reuse system it is advisable to review risk controls of other bleed water reuse systems that are currently in operation at other workplaces.

### **Controlling microbial risks from storage of bleed water for greater than 24 hours.**

The storage system should be designed, constructed, and positioned such that:

- It is constructed of non ferrous, corrosion resistant materials with smooth internal surfaces devoid of crevices and joints.
- Ingress of organic matter and suspended solids is prevented by a filtration system, and keeping the system closed to the outside environment;
- Insects and rodents are prevented from entering the system;
- A means of visually inspecting the wetted surfaces is possible;
- A means of cleaning the wetted surfaces is possible;
- A means of ventilating the storage system with fresh air if entry to the storage system is required;
- A means of draining the water from the storage system;
- The storage system is protected from warming by sunlight.

The water treatment program should include the following:

- a suitable, continuous water treatment program for effective management of corrosion, scaling, fouling and microbial growth, including *Legionella sp.* It is recommended that the water treatment be automated<sup>37</sup>;
- provision of an effective biocidal concentration/dose/action level in the system at all times;
- biocidal processes selected to avoid problems associated with particular bacterium developing a tolerance to a particular biocide process. Therefore dual or alternating biocidal processes are recommended;
- the control of corrosion and scale
- regular monitoring of pH;

---

<sup>37</sup> Auto-dosing can be used to control pH, the concentration of biocide(s) and corrosion inhibitors. Such equipment is not fail-safe and must be regularly checked and properly maintained to ensure that the expectations of the water treatment program are achieved.

- monitoring of biocide concentration where practicable. Examples of where this is possible include for UV systems, or chlorine or bromine in conjunction with pH measurement, or an ORP system;
- a means of ensuring the water in the storage tank is circulated and has sufficient contact time with the chosen biocide;
- the use of a biodispersant to help break down the biofilm on the wetted surfaces in the storage system;
- the bleed water should be filtered when leaving the cooling tower so as to remove potential nutrient sources for micro-organisms.

Inspection and servicing of the bleed water storage system and water treatment program should be carried out at least monthly by a competent person, for example a Water Treatment Service Provider<sup>38</sup>, who can

---

<sup>38</sup> A competent person should have suitable experience and knowledge for the task/s being performed. It is likely that a Water Treatment Service Provider (WTSP) would have the suitable

make an assessment of whether the water storage system is being maintained correctly.

This servicing should include:

- a visual inspection of the storage system for the presence of:
  - scale and particulate matter such as dirt, dust, insects, and leaves,
  - slime and microbial growth such as algae and fungi,
  - corrosion products;
- checking the clarity of the water;
- checking that the water treatment system is functioning correctly, including:
  - all dosing and control equipment
  - timers, pumps, and tubing
  - checks on flow rate of dosing equipment
  - adequacy of supply of any chemicals being dosed
  - integrity of filtration system;

---

experience and knowledge for this task. Responsibilities of WTSPs are described in Section 7 of the *Guide to Legionella Control in Cooling Water Systems, including Cooling Towers*.

- routine water analysis, including pH, heterotrophic colony count (HCC), and *Legionella sp*;
- the calibration and inspection of water monitoring and dosing equipment;
- repair of obvious physical defects or damage,
- checking for leaks and unexplained water losses.

A visual inspection of all wetted surfaces of the storage system with the storage system empty should also be conducted on a yearly basis – carrying this out at a time when the storage is empty would save water. Where the storage system is inspected by a diver, there must be compliance with the *Workplace Health and Safety Regulation 1997, Part 12 – Underwater diving work*.

Cleaning procedures should be documented for each water storage system.

Physical and chemical cleaning (to a visual state of cleanliness) should be

performed on a routine basis, and when required as identified by inspection of the storage system. Such cleaning includes removal of corrosion products, rust, scale, slime, sludge, mould, algae, biofilm and fungi. These pollutants are known to provide nutrients for the growth of micro-organisms such as *Legionella*.

The frequency of cleaning maintenance programs should be determined by a risk management process. It is recommended, however that the systems undergo this cleaning process annually.

The cleaning procedure should be based upon that outlined in Appendix One.

HCC and *Legionella sp* should be tested on a regular basis as determined by risk assessment – HCC should be conducted at least monthly, and *Legionella sp* at least 3 monthly using the methods described in Appendix 2.

If *Legionella sp.* are detected in the bleed water storage system at levels > 10 CFU/mL the supply of the stored bleed water to the downstream processes shall cease until the levels are controlled below 10 CFU/mL.

If the Heterotrophic Colony Count in the bleed water storage system is  $\geq$  100,000CFU/mL the supply of the stored bleed water to the downstream processes shall cease until the levels are controlled below 100,000 CFU/mL.

The appropriate interventions for unacceptable bacterial counts in the bleed water storage system are outlined in Appendix 3.

If *Legionella sp.* are detected in cooling tower at levels > 10 CFU/mL the supply of bleed water to the storage system shall cease until the levels in the cooling tower are controlled below 10 CFU/mL.

If the Heterotrophic Colony Count in the cooling tower is > 100,000 CFU/mL the supply of bleed water to the storage system shall cease until the

levels in the cooling tower are controlled below 100,000 CFU/mL.

The owner or person in control of the bleed water storage system should ensure documented risk management information, including that listed below, is kept at the site of the storage system. This information should be immediately accessible to any service personnel and Workplace Health and Safety Inspectors, and should include.

- the documented risk assessment;
- the water treatment specifications;
- planned service and maintenance requirements of water storage system;
- all results of water sampling and analysis;
- key performance indicators and Targets;
- material safety data sheets for any chemicals used in water treatment;
- water treatment dosing rates;
- water storage volumes for dosing calculations;
- cleaning procedures;

- disinfection/decontamination procedures;
- confined space procedures for entry to storage systems;
- emergency contact details;
- service, inspection, corrective action, cleaning, disinfection, decontamination reports for the water storage system;
- history of any previous action taken in response to significant KPI/Target variations.

As part of your risk assessment and before implementing your bleed water storage system it is advisable to review risk controls of other bleed water storage systems that are currently in operation at other workplaces.

## References

*Australian/New Zealand Standard 1715 – Selection, Use and Maintenance of Respiratory Protective Devices*

*Australian/New Zealand Standard 1716 - Respiratory protective devices*

*Australian/New Zealand Standard 2031: Selection of containers and preservation of water samples for microbiological analysis*

*Australian/New Zealand Standard 3666.1 – Air-handling and water systems of buildings – Microbial control, Part 1: Design, installation and commissioning*

*Australian/New Zealand Standard 3666.2 - Air-handling and water systems of buildings – Microbial control, Part 2: Operation and maintenance*

*Australian/New Zealand Standard 3666.3 - Air-handling and water systems of buildings – Microbial control, Part 3: Performance-based maintenance of cooling water systems*

*Australian/New Zealand Standard 3896:1998 - Waters – Examination for Legionellae including Legionella pneumophila*

*Australian/New Zealand Standard 4276.3.1 – Water microbiology – Heterotrophic colony count methods – Pour plate method using plate count agar*

*Australian/New Zealand Standard 4276.3.2 Water microbiology - Heterotrophic colony count methods – Plate count of water containing biocides*

*Australian Standard AS 5059-2003 Power station cooling tower water systems – Management of legionnaire's disease health risk*

*Plant Code of Practice 2005*, Queensland Department of Employment and Industrial Relations.

*Risk Management Code of Practice 2007*, Queensland Department of Employment and Industrial Relations.

## Further Reading

*A Guide to Developing Risk Management Plans for Cooling Tower Systems*. 2001. Public Health Division, Victorian Government Department of Human Services

*Evaporative Coolers. An Operation and Maintenance Guide for Owners*. Public Health Division, Department of Human Services, Victoria. June 2000

*Draft Code of Practice for Water Treatment Service Providers (Cooling Tower Systems)*. Published by Public Health Group, Victorian Government Department of Human Services Melbourne, Victoria 3000

*Guide to the workplace use of non-potable water, including recycled waters*, Queensland Department of Employment and Industrial Relations, 2007

SAA/SNZ HB32 - *Control of microbial growth in air-handling and water systems of buildings*

*NSW Code of Practice for the Control of Legionnaires' Disease*, 2<sup>nd</sup> edition, NSW Department of Health, June 2004