

**INTERPRETATION IC 188-2015-1 OF
ANSI/ASHRAE STANDARD 188-2015
Legionellosis: Risk Management for building Water Systems**

Date Approved: June 30, 2015

Request from: Frank T. Morrison, Baltimore Aircoil Company, 7600 Dorsey Run Road, Jessup, MD 20794.

Reference: This request for interpretation refers to the requirements presented in ANSI/ASHRAE Standard 188-2015, Section 6.2, relating to Program Development.

Background: Section 6.2, Program Development, says “When the building survey required by Sections 4 and 5 indicates the presence of one or more of the building water systems listed in Section 5.1, but none of the factors listed in Section 5.2, a Program shall be implemented to manage the risk of legionellosis for the building water systems listed in 5.1.” It further expounds that “When the building survey required by Section 4 and 5 indicates the presence of one or more of the factors listed in Section 5.2, a Program shall be implemented to manage the risk of legionellosis for the potable building water systems and for building water systems listed in Section 5.1.

It is implied, but not actually stated that if the only thing found in the building survey required by Sections 4 and 5 is one or more of the items contained in Section 5.1 and none of the factors contained in Section 5.2 are found, then the required legionellosis risk management Program needs to be completed only for the items in Section 5.1 and that a legionellosis risk management Program does not need to be completed for any other portion of the building water system. There needs to be improved clarity of exactly what the Program must include, based on the results of the required survey.

Interpretation: If the building survey required by Sections 4 and 5 identifies one or more cooling towers (or fountains or other items in Section 5.1) and identifies none of the factors contained in Section 5.2, then a legionellosis risk management program must be completed only for those cooling towers (or fountains or other items in Section 5.1) and a legionellosis risk management program is not required for any other building water systems.

Question: Is this interpretation correct?

Answer: Yes.

Comments: A legionellosis risk management Program for all building water systems is only required by Standard 188 if the survey required by Sections 4 and 5 identifies one or more of the factors contained in Section 5.2. Since your interpretation request stated none of the factors contained in Section 5.2 were identified, the legionellosis risk management Program is only required to be completed for the cooling towers or other items in Section 5.1.