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Sent: Friday, May 01, 2015 3:00 PM
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Cc: raelynn.hicks@mclaren.org; danete.hayman@mclaren.org; henry.lobb@mclaren.org; jas on.white@mclaren.org
Subject: Water Safety Plan/HACCP Information
Attachments: EPA Small Systems Webinar Series_April 28_2015.pdf; WHO- LegionellaAndPreventionOfLegionellosis-2007.pdf; VHA Directive 1061 - Prevention of Healthcare associated Legionella 8-2....pdf; WHO-WaterSafetyInBuildings-2011.pdf

Rusty,

Thanks again for arranging the meeting with me earlier this week. As discussed during the meeting, use of your continuous chlorine disinfectant chemical feed system constitutes a public water system triggering requirements under the safe drinking water act, and I will be following up in the near future with more information regarding those requirements. As a reminder our office would need to permit any new treatment equipment prior to installation and use.

Today, I am providing additional information regarding Water Safety Plans and Hazard Analysis Critical Control Points (HACCP) system for your information/use.

Attached are two documents from the World Health Organization regarding Legionella and the development of water safety plans. Both have information specific to health care facilities. Also attached is the latest VHA directive to their facilities regarding protocols for the prevention of legionella. And the last attachment is from an EPA webinar earlier this week regarding Healthcare water systems. The later portion of this document contains information regarding various treatment systems, including chlorine dioxide which you indicated is currently under consideration.

The video linked below reviews the HACCP/Water Safety Plan process steps. (*Best Practices in Preventing Disease From Waterborne Pathogens in Healthcare Water Systems*):

<https://youtu.be/LHnU2YSaag0>

The basic Implementation Protocol is as follows:

1. Establish an HACCP team (responsible and accountable)
2. Describe the water system(s)
3. Develop the process flow diagrams
4. Confirm process flow diagrams with onsite audits
5. Perform systematic hazard analysis and risk characterization
6. Determine critical control points
7. Establish critical control limits (quantitative parameters)
8. Monitoring Methods and Frequencies
9. Develop Corrective Actions
10. Verification of HACCP implementation
11. Verification of hazard control
12. Documentation, communication, and recordkeeping

From our meeting it appears that you have already accomplished most of steps 1-4 of the protocol, but may want to consider refining protocol steps 5-12 of your existing plan. The attached documents from WHO should help to guide you through this process.

Al Kubly, Section Head of Facilities Operations, Mayo Clinic, would be an excellent contact on how to develop your water safety plan/HACCP. He chairs their Water Management Team that is implementing the Mayo Clinic's Potable Water Quality Program, which he spoke about at a recent conference. The Clinic phone number in Rochester, MN is 507-284-2511.

I will be in touch regarding public water system requirements and your existing treatment equipment, but in the meantime please let me know if you are in need of any further assistance or have any questions regarding these matters.

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