



City of Hamilton
Public Health Services
Office of the Medical Officer of Health
1 Hughson Street North, 4th Floor
Hamilton, Ontario L8R 3L5

May 27, 2010

Attention: Property Manager/Cooling Equipment Operator/Owner

Subject: Legionella Control in Cooling Towers and Evaporative Condensers

The City of Hamilton Public Health Services (PHS) is requesting your cooperation to help diminish the risk of exposure to Legionella bacteria to those individuals who live and work in our community.

Cooling towers and evaporative condensers have been implicated as causes of Legionella infections in community and occupational health settings. Research has shown that a comprehensive Legionella control program can greatly reduce the risk of cooling equipment causing a Legionella infection.

Public Health Services strongly urges that all cooling tower and evaporative condenser owners/operators ensure that their cooling equipment is properly maintained according to ASHRAE and/or CTI industry best practices. You can access these documents at www.hamilton.ca/publichealth under Legionella.

It is important to recognize that chemical treatment is only one aspect in minimizing risks from cooling towers and evaporative condensers. Cost effective chemical free alternatives are also available that might be effective in reducing these health risks.

If you have not yet done so, please assess your Legionella control program for your cooling tower or evaporative condenser as soon as possible. Should you have any questions, please contact City of Hamilton, Public Health Inspector John Fortuna at 905-546-2424 ext. 3038.

Cooling Tower Registry By-law

In Fall 2009, Public Health Services corresponded with you regarding the proposed *Cooling Tower Registry By-law*. The intent of this By-law is to have all cooling towers registered with Public Health Services, ensure that a Risk Management Plan is in place, and that an up-to-date log book of all maintenance activities is available.

PHS would like to thank all individuals who reviewed the Draft Cooling Tower Registry By-law, completed the survey and/or provided comments. The survey findings indicated that one hundred percent (100%) of the respondents were aware of the risk of exposure

to Legionella bacteria from Cooling Towers (CT) and believed it was important for PHS to address this concern through having access to a CT registry. Eighty percent (80%) supported PHS as the logical administrator of the proposed By-law due to their Public Health Protection mandate.

PHS has revised the By-law to eliminate the exclusion of seasonally operated Cooling Towers or Evaporative Condensers, and registration fees are not being required.

Enclosed are;

- An updated draft Cooling Tower Registry By-law for your review and comment.
- Draft Registration Forms. As a trial only and to obtain feedback on the registration form, PHS asks if you could complete the Cooling Tower Registration Form and the Cooling Tower Details Form.

Please provide any feedback and/or comments to natasha.mihhas@hamilton.ca regarding the draft Cooling Tower Registry By-law and the user friendliness of the Cooling Tower Registration and Details Forms. Comments or suggestions must be submitted by June 15, 2010 to ensure they are included in potential revisions.

PHS intends to conduct further public consultation in 2010 and recommend the passing of a final By-law in early 2011. After the By-law comes into effect the registration form will need to be completed for initial registration and any changes will need to be noted and submitted within 30 days after the change in information. The CT details form will need to be submitted on an annual basis for each cooling tower registered.

If you have any questions regarding the Cooling Tower Registry By-law please contact City of Hamilton, Environmental Health Promoter, Natasha Mihhas at 905-546-2424 ext. 7902.

Sincerely,



Elizabeth Richardson, MD, MHSc, FRCPC
Medical Officer of Health, City of Hamilton

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Attach.