

## **Governor Gavin Newsom**

June 15, 2023

## Garratt Callahan

Garratt Callahan (GC) conducted pre-remediation sampling of the domestic water system on 4/17/2023 during which they collected 25 representative samples (19 water, 6 swabs) and found 18 were positive (72%) for Legionella. GC recommended hyperchlorination and installation of in-line filters on every faucet. Hyperchlorination occurred on 4/20/2023 (i.e., injection of chlorine dioxide to both the cold and hot water systems), and in-line filters were installed on 4/21/2023. GC conducted post-remediation sampling on 5/2/2023 to evaluate the remediation efforts. In-line filters were removed during sampling to evaluate the efficacy of hyperchlorination. GC took 20 samples based on previous positive results and found 6 to be positive (30%) for Legionella. This significant reduction in Legionella indicates the remediation efforts, including hyperchlorination, were effective. GC recommends a flushing program as well as Water Management Plan to control the growth of Legionella in the building's water system. While a Water Management Plan, which includes a flushing program, is developed, the in-line filters which have been installed at every fixture will reduce employee exposure by capturing Legionella bacteria before it gets to the fixture.

## Forensic Analytical Consulting Services

Forensic Analytical Consulting Services (FACS) conducted pre-remediation sampling on 4/17/2023 and 4/18/2023. FACS collected 41 samples focusing on areas previously reported as positive and found 18 samples were positive (44%) for Legionella. FACS provided verbal recommendations to DIR to apply filtration, replace and/or clean fixtures with positive results. These recommendations were relayed to DGS and implemented. FACS conducted post-remediation testing on 5/3/2023 to evaluate the efficacy of remediation efforts. FACS conducted sampling with the in-line filters installed based on FACS' pre- remediation sampling which indicated localized contamination of fixtures. By sampling with in-line filters in place, results can confirm if there is localized contamination. FACS collected 44 samples focusing on areas previously reported as positive and 5 were positive (11%) for Legionella. While this is a significant reduction in Legionella levels, localized contamination was confirmed in a small number of fixtures. FACS verbally recommended these fixtures be replaced or cleaned. DGS replaced the fixtures that tested positive on 5/23/2023.

## Conclusion from post-remediation sampling

Hyperchlorination along with flushing of the building water system and installation of inline filters was effective in significantly reducing, though not eliminating, the Legionella levels in the water system. Localized contamination of Legionella was present in a few fixtures and cleaning and/or replacement of identified fixtures was conducted to remediate the localized Legionella in those fixtures. In-line filters should remain on fixtures until a comprehensive Water Management plan (utilizing CDC, AIHA and ASHRAE guidelines) is in place and on-going routine water testing confirms Legionella is well-controlled (<1 CFU/mL) based on CDC established guidelines.