



University of
St Andrews

Control of legionella risk in water systems

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0.5	Amendment of document to include provision for Deputy Responsible Person (Residential leased Properties)	Draft	Michael Orr H&S Manager, EHSS	18.01.2023

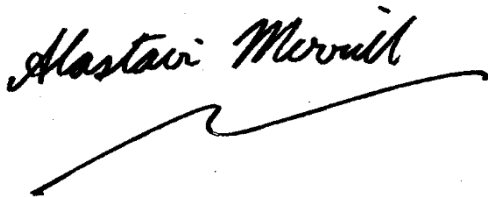
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1. LEGIONELLA POLICY STATEMENT

- 1.1. Legionella are family of gram negative pathogenic bacteria naturally present in water systems. In low numbers they do not represent a significant risk to human health. However, in high numbers they may result in respiratory illnesses including *Lochgoilhead Disease* and *Pontiac Fever* which are not normally lethal, or in *Legionnaire's Disease* which can be fatal to vulnerable persons. Collectively diseases caused by the legionella bacteria are called **legionellosis**.
- 1.2. It is the policy that the University shall take all reasonably practicable measures to prevent staff, students, visitors and members of the public from contracting legionellosis due to the activities of the University.
- 1.3. This will include the appointment in writing of suitably competent persons to be responsible for the management of the University legionella risk, along with delegated authority to take necessary actions to manage said risk.
- 1.4. It is the policy of the University that an assessment of the risk of legionellosis will be carried out for every building within the University having a water system and before any new additions or changes to the building are embodied. This will include a detailed description of the water systems. The assessment will include appropriate and proportionate control measures for eliminating or minimising the risk of legionella infection.
- 1.5. The University will take all reasonably practicable measures to comply with all relevant legislation and guidance with regard to Legionella bacteria, and will produce a **Legionella Management Plan** detailing the steps taken to ensure compliance.

Signed on behalf of the University



Alastair Merrill
VP Governance

Date 1 February 2023



Derek A. Watson FCCA
Quaestor and Factor

Date 1 February 2023

2. APPLICABILITY OF THIS POLICY

2.1. The University has duties for all structures and buildings it currently owns and operates to the extent of its control.

2.2. This policy will apply to all buildings forming part of the University's undertaking in the following manner:

- **University owned properties** - The University has responsibility to ensure the water management and maintenance programme is being undertaken as a minimum to the standards required by law.
- **Leased properties** - The landlord, duty to ensure the design, installation and materials used are compliant and in a fit state. The University has a duty to ensure the water system is being assessed and is managed – who does this must be clarified in the contract of lease.
- **New build or whole building refurbishment construction works** - Buildings under construction are the responsibility of the Principal Contractor until handover at the completion of the Construction Phase under the Construction (Design and Management) Regulations 2015 (CDM 2015). The University's duty is to ensure the Principal Contractor is aware of these duties. Once construction has completed and any buildings are handed over they fall into one of the other categories.
- **Partial refurbishment** – Existing buildings where significant parts of the building are being refurbished, but where part of the building remains occupied by the University.

2.2..1. There is a non-delegable duty on the University to ensure the safety of the whole water system(s) and consideration of the systems must be given **before** commercial contracts with contractors are drawn up to ensure clarity of roles and responsibilities.

2.2..2. Where there is one water system for the building, the whole water management system will remain under the control of the University. Where there are multiple water systems for the building, control over the water management system may be passed to the Principal Contractor for that part of the building affected by the works, with the University retaining responsibility for the part of the building occupied by the University.

- **Beneficial Occupation** - Where it is necessary for the building to be occupied under beneficial occupation terms, the water system for the whole building (or occupied part of the building as per 2.2.4.2 above) **must** be brought under University water management system **before** University occupation.

- Irrespective of the type of construction works (new-build, complete or partial refurbishment), the University retains a non-delegable responsibility for the suitability of the design and materials used in the construction of the water system.
- The University must ensure suitable arrangements for the timely and proper handover the water systems at the end of construction projects.
- **Sub-letting** - Where the University sub-lets residential properties owned by private landlords, the University has obligations to ensure the duties for the control of legionella have been complied with.

3. LEGISLATIVE BASIS

3.1. There is a legal requirement to manage the risks associated with exposure to legionella bacteria in the workplace. This is brought about by means of the following pieces of UK health and safety legislation:

- The Health and Safety at Work etc. Act 1974;
- The Control of Substances Hazardous to Health Regulations 2002 (as amended);
- The Management of Health and Safety at Work Regulations 1999;
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013;
- The Provision and Use of Work Equipment Regulations 1998.

3.2. Underpinning these, there are detailed Health and Safety Executive (HSE) published documents which are enforceable and have a standing in law.

- Legionnaires' Disease, The control of legionella bacteria in water systems - Approved Code of Practice (ACoP), 4th Edi 2013 - L8.
- Legionnaires' Disease, Part 2: The control of legionella bacteria in hot and cold water systems – Technical Guidance, 1st Edi 2018- HSG274.
- Legionnaires' Disease, Part 3: The control of legionella bacteria in other risk systems – Technical Guidance, 1st Edi 2018- HSG274.

3.3. There are also a number of relevant water regulations including:

- The Water Supply (Water Quality) Regulations 2001
- Water Industry Act 1991
- Water (Scotland) Act 1980
- The Public Water Supplies (Scotland) Regulations 2014
- The Water Supply (Water Quality) (Scotland) Regulations 2010

- The Water Supply (Water Fittings) (Scotland) Byelaws 2014

4. MANAGEMENT ARRANGEMENTS

- 4.1. The management arrangements identify how legionella risk will be managed, relevant persons and responsibilities allocated, and establishes standards to be followed.

5. Management System

- 5.1. The [University Health and Safety Policy](#) outlines how the University will manage health and safety in accordance with the [HSE's Guidance for Management Systems \(HSG65\)](#) which follows a Plan (Section 6), Do (Section 7-9 and 10-12), Check (Section 10, 11 and 6), Act (Section 6) cycle.
- 5.2. The **Legionella Management Plan** outlines how these elements will be conducted in greater detail and will be supported by technical design and maintenance documents detailing operational arrangements.

6. Roles and responsibilities

- 6.1. This section summarises the key roles and responsibilities for managing the risks of legionella bacteria in water systems in the University. Full details of the key roles and their respective responsibilities are contained within the relevant Appendices to this document.
- 6.2. The University of St Andrews as an organisation is the duty-holder under the terms of the regulations and the ACoP and is required to have a knowing and controlling mind to be the accountable person. Health and safety law considers this to sit with the senior-most person within the organisation – for the University this is the Principal, see [Appendix 1](#).
- 6.3. Organisationally, the University discharges its duty to manage the risks associated with legionella bacterial in water systems by delegating responsibility and authority to the *Responsible Person* for university owned structures.
- 6.4. The Director Estates shall be responsible for the provision and maintenance of water systems in University buildings, so far as is reasonably practicable, that can be safely accessed, are properly designed, constructed and are maintained, see [Appendix 2](#).
- 6.5. The [Approved Code of Practice \(L8\)](#) creates a specific requirement on the duty holder to appoint one or more competent persons to undertake the measures necessary to comply with the requirements of [COSHH](#). These persons are referred to as the '*Responsible Persons*' and must be appointed in writing to take responsibility for controlling the risk arising from legionella bacteria in the organisation's water systems. In the absence of appointing a *Responsible Person*, the duties of that role revert to the **accountable person** for legionella.

- 6.6. Within the University structure, the *Responsible Person* role requires to sit at a Senior level with sufficient authority to ensure resources are made available to enable the necessary operational procedures are carried out as required. This role will be fulfilled by the **Director Operations (Estates)**, having both authority and engineering knowledge, See [Appendix 3](#).
- [Schedule 1](#) is the template for this appointment and [Schedule 2](#) is the template for the written acceptance of this appointment. Copies of the signed letters of appointment and acceptance must be provided to the Head of EHSS.
 - Because the risks from legionella bacteria are time sensitive and can affect many people, sufficient authority must be delegated from Principal to allow for a timely response. The *Responsible Person* needs to be able to instruct the necessary corrective actions to make safe, including immediate works to decontaminate a water system and, if necessary to shut down water services to the building until it is safe to resume the water services.
 - The authority and decision of this role must not be challenged at any level resulting in a loss of action or a lesser action due to pressures being applied, whilst the risk remains.
 - The *Responsible Person* will escalate to the **accountable person** if they are unable to manage the risk.
- 6.7. The University of St Andrews shall appoint one or more *deputy Responsible Person(s)* for reasons of business continuity who shall assist the *Responsible Person* by ensuring that the day to day activities and planned operational activities are undertaken. [Schedule 3](#) is the template for this appointment and [Schedule 4](#) is the template for the written acceptance of this appointment. Copies of the signed letters of appointment and acceptance must be provided to Head of EHSS.
- 6.8. The University of St Andrews will appoint one or more *deputy Responsible Person(s) (Residential Leased Properties)* who shall assist the *Responsible Person* by ensuring that the day to day activities and planned operational activities required for leased properties are undertaken. [Schedule 5](#) is the template for this appointment and [Schedule 6](#) is the template for the written acceptance of this appointment. Copies of the signed letters of appointment and acceptance must be provided to Head of EHSS.
- 6.9. The *Responsible Person* shall appoint a Competent Person to provide them with competent technical (mechanical, plumbing and water treatment) advice on the control of legionella. A copy of the letters of appointment and acceptance shall be provided to Head of EHSS. This advice may be supported and supplemented by subject matter experts from industry as required.
- 6.10. An EHSS Health and Safety Manager shall be the responsible Competent Person to provide competent Legal advice to the *Responsible Person* and for establishing the standards detailed in this Policy document.

- 6.11. The Workplace Safety Committee of the University of St. Andrews shall ensure that all relevant stakeholders cooperate with the *Responsible Person* in the management of legionella risk across the University and monitor progress against the Legionella Management Plan.
- 6.12. Competent **contractors** can be employed to undertake legionella risk assessments and also for implementing the written scheme to eliminate or minimise the risks of legionella. The employment of contractors does not remove the responsibility of the University as the **duty holder** to ensure that the risk from legionella bacteria is managed and controlled. All legionella contractors will operate under the control of the Building Service Manager (Mechanical) who will report to the *Responsible Person* and the *deputy Responsible Person*.
- 6.13. The Environmental Health and Safety Services shall have the role of identifying standards, undertaking inspections and audits to verify that the University is delivering against its duties. Together with the *Responsible Person*, EHSS will conduct investigations of legionella incidents.
- Where necessary EHSS may require Estates professional and trades staff to provide EHSS with technical reports in relation for plumbing or heating details relating to any legionella incident.
 - EHSS will undertake annual internal audits of the arrangements in place to control the risk of legionella in hot and cold water systems, and operational compliance against required standards.
- 6.14. In addition to the internal audits, an external auditor will be appointed to undertake an accredited audit of the control of legionella on a 3 yearly cycle. To ensure the independence of this audit, the appointed auditor will be not be from any of the appointed legionella contractors appointed to undertake inspections, risk assessments, prepare written schemes or implement operational controls, at the time of the audit.

7. Risk Assessments

- 7.1. The *Responsible Person* shall ensure that a suitable and sufficient risk assessment in accordance with the requirements of BS8580:2019 *Water Quality, Risk assessments for legionella control – Code of practice* and considers the requirements of HSE publications HSG 274 parts 1-3 is held for all the hot/cold water systems in all the University buildings.
- 7.2. The *Responsible Person* shall ensure that risk assessments are in place for other stand-alone water systems (e.g. fish tanks). These will be identified, registered as an asset and risk assessed. The management of these other risk systems will be in line with HSG 247 Part 3 and with the findings of the risk assessments as a minimum.

8. Requirement for schematic diagrams

8.1. The *Responsible Person* shall ensure that a current detailed schematic diagram is held for all the hot/cold water systems in all the University buildings that identifies all individual elements or assets forming part of the water system, based off of full track and trace surveys.

9. At-Risk Groups

9.1. Anyone can develop legionellosis but there are particular groups of people who are at heightened risk.

9.2. The University does not hold relevant information about the presence of such groups, either amongst its employees, students or visitors. **Therefore, it must by default consider all persons may be members of the vulnerable group and implement control measures accordingly.**

End

Appendix 1, Role of the Principal

Ultimate responsibility for water management systems (i.e. the **Accountable Person**) within the University sit with the Principal as the senior-most identifiable role.

As a minimum, the Principal must have an understanding of the risks of legionella bacteria in water systems and the basic control measures required to manage the risk.

The Principal must understand and approve of the chain of command for the management of legionella risks.

This should be achieved by the Principal reading the [Control of Legionella Risk in Water Systems Policy and Management Arrangements](#) document.

Appendix 2, Role of the Director of Estates

The Director of Estates has overall responsibility for the delivery and maintenance of the fabric of the University built estate. This responsibility is delegated from the Office of the Principal to the Estates Department.

The Director Estates shall be responsible for the provision and maintenance of water systems in University buildings, so far as is reasonably practicable that:

- Can be safely accessed. That they are without a risk to health (for example from the presence of asbestos or other respiratory contaminants) and that they are without a risk to safety (for example from fall from height or as a result of spaces being confined spaces as defined).
- Are properly designed. That the design of all parts of the system are suitable for the functional intent, and that the design takes cognisance of all operations the equipment is required to fulfil. The design must not introduce hazards to the operations (for example access hatches located below ceilings with clearances so small as to render access dangerous or impossible, or functional components obstructed by fixed installations for other services).
- Are constructed of suitable materials to prevent the growth of biological organisms (including legionella bacteria). All parts of water systems should be free from materials liable to degrade and form a harbour for biofilm or legionella bacteria, or to degrade and form a nutrient source for them. All materials used should conform to the [WRAS Products and Materials Directory](#).
- Are maintained (including cleaned as appropriate) in an efficient state, in efficient working order and in good repair. This obligation comes from Regulation 5(1) of the Workplace (Health, Safety and Welfare) Regulations 1992.

The Director of Estates is responsible for ensuring that suitable arrangements and sufficient appointments are made within the Estates Department to enable the operational activities to be delivered, and that these are aligned with the **Legionella Management Plan**.

The training requirements for the Director Estates as a minimum, consist of reading the Control of Legionella Risk in Water Systems Policy and Management Arrangements document.

Appendix 3, Role of the Responsible Person (and their deposes)

The Responsible Person (and their deposes) is a key role in the control of legionella in water systems, appointed by the Office of the Principal with delegated authority to plan and manage the safety of the water systems across the University.

The *Responsible Person* (and their deposes) must be competent – i.e. have sufficient information, instruction and training.

- In particular they should know the potential sources of legionella bacteria and the risks they represent;
- Measures to adopt, including the precautions to take to protect people, and their significance;
- Measures to take to ensure the control measures remain effective, and their significance.

The minimum training requirement for the Responsible Person (and their deposes) is the [2-day City and Guilds Legionella: Role of the Responsible Person/Duty Holder/Landlord training course WS1](#). This training is valid for a period of 3 years or until the current legislative and HSE guidance significantly changes (whichever happens soonest). Thereafter the post holder must undertake a 1 day refresher course.

It is recommended that the Responsible Person (and their deposes) undertake the [2 day City and Guilds Management of Legionella Bacteria in Hot and Cold Water Systems training course WS2](#) and the [1 day City and Guilds Disinfection of Water Supplies in Buildings training course WS3](#).

There are a number of specified duties the *Responsible Person* (and their deposes) must fulfil, these include:

1. **(COSHH Reg. 7)** Develop the **Legionella Management Plan** detailing how legionella risk will be managed across the University estate. This plan must:
 - Have clear actions set against compliance objectives (legislative and guidance based);
 - Include suitable and effective interim measures to deal with immediate risk;
 - Be prioritised based on clear risk factors;
 - Be time bound;
 - Be realistic;
 - Be supported by clearly identified resources, including personnel and budget.
2. **(COSHH Reg. 6)** Ensure a suitable and sufficient legionella risk assessment is held for all water systems.

3. **(COSHH Reg. 7)** Ensure there is a written scheme developed from each legionella risk assessment, detailing how each building will be managed.
4. **(COSHH Reg. 8)** Ensuring that suitable arrangements are in place, including information, equipment and personnel to manage the risks and implement the control measures identified in the risk assessments and written schemes.
5. **(COSHH Reg. 9)** Ensuring suitable arrangements are in place to ensure all parts of the water systems are under a relevant programme of inspection and maintenance. Where defects are detected liable to cause harm or ill health, these can be remedied immediately or steps taken to make safe.
6. **(COSHH Reg. 10)** Ensuring there is an appropriate regime for biological monitoring of any water systems not fully under control, and that it is effectively implemented.
7. **(COSHH Reg. 12)** Ensure all persons who have a role in the management of legionella or the implementation of control measures are competent to do so, including through the provision of training.
 - 7.1. For employees of the University this duty extends to ensuring all persons who have a function within the water management system are identified and have clear descriptions of the associated role, responsibility, information and training required to discharge the duties.
 - 7.2. For contactors this includes verification that they have membership of the [Legionella Control Association](#) with the relevant area of specialism. Confirmation that the contractor has no prior enforcement history for health and safety breaches; evidence that the contractor has an effective audit programme; and evidence that the contractor's operatives are qualified and competent to the relevant tasks.
8. **(COSHH Reg. 12(2)(d))** Where the results of any biological monitoring show the presence of legionella bacteria in water systems in concentrations liable to cause harm to human health (i.e. above 100 cfu/l in a system capable of forming an aerosol), ensuring all employees or persons who may have been exposed are informed of this exposure in a timely manner.
9. **(COSHH Reg. 13)** Ensure there are arrangements in place to deal with accidents, incidents and emergencies for the protection of all persons and to be able to return the situation to normal working conditions.
 - 9.1. Ensure where a water system is out of specification and poses a risk to health, that EHSS is informed in a timely manner.
10. **(COSHH Reg. 6 / 9 / 10 & 12)** Ensure suitable records about the management of legionella are maintained.
11. Ensure effective communications between all persons who have a role to play in the management of legionella or the implementation of control measures.

Schedule 1 - Letter of appointment for Responsible Person - Legionella

The University of St Andrews, hereby appoints in writing the person of Simon Watkins, Estates Director of Operations to discharge the role and responsibilities of the *Responsible Person* as described in the policy document [Control of Legionella Risk in Water Systems](#) . These include:

- The development of a legionella management plan detailing how legionella risk will be managed across the University estate.
- Ensure a suitable and sufficient legionella risk assessment is held for all water systems.
- Ensure there is a written scheme developed from each legionella risk assessment, detailing how each building will be managed.
- Ensuring that suitable arrangements are in place, including information, equipment and personnel to manage the risks and implement the control measures identified in the risk assessments and written schemes.
- Ensuring suitable arrangements are in place to ensure all parts of the water systems are under a relevant programme of inspection and maintenance. Where defects are detected liable to cause harm or ill health, these can be remedied immediately or steps taken to make safe.
- Ensuring there is an appropriate regime for biological monitoring of any water systems not fully under control, and that it is effectively implemented.
- Ensure all persons who have a role in the management of legionella or the implementation of control measures are competent to do so, including through the provision of training.
- Where the results of any biological monitoring show the presence of legionella bacteria in water systems in concentrations liable to cause harm to human health, ensuring all employees or persons who may have been exposed are informed of this exposure in a timely manner.
- Ensure there are arrangements in place to deal with accidents, incidents and emergencies for the protection of all persons and to be able to return the situation to normal working conditions.
- Ensure where a water system is out of specification and poses a risk to health, that EHSS is informed in a timely manner.
- Ensure suitable records about the management of legionella risk are maintained.
- Ensure effective communications between all persons who have a role to play in the management of legionella risk.

This letter of appointment is valid for a period of 1 year.

Signed Derek Watson, Quaestor and Factor _____

Date __1 February 2023_____



Schedule 2 - Letter of acceptance of appointment as Responsible Person - Legionella

I Hereby accept appointment to the role of Responsible Person – Legionella for the University of St Andrews as detailed in your letter of appointment dated _____. I acknowledge and understand the duties associated with the role and that this appointment delegates the authority from the Principal to me in order to discharge these duties.

Signed _____, Estates Director of Operations

Date _____

Schedule 3 - Letter of appointment for Deputy Responsible Person - Legionella

The University of St Andrews, hereby appoints in writing the person of Thomas Smith, Estates Head of Technical Services to discharge the role and responsibilities of the *Deputy Responsible Person* as described in the policy document [Control of Legionella Risk in Water Systems](#). These include to assist and deputise for the *Responsible Person* as appropriate in:

- The development of a legionella management plan detailing how legionella risk will be managed across the University estate.
- Ensure a suitable and sufficient legionella risk assessment is held for all water systems.
- Ensure there is a written scheme developed from each legionella risk assessment, detailing how each building will be managed.
- Ensuring that suitable arrangements are in place, including information, equipment and personnel to manage the risks and implement the control measures identified in the risk assessments and written schemes.
- Ensuring suitable arrangements are in place to ensure all parts of the water systems are under a relevant programme of inspection and maintenance. Where defects are detected liable to cause harm or ill health, these can be remedied immediately or steps taken to make safe.
- Ensuring there is an appropriate regime for biological monitoring of any water systems not fully under control, and that it is effectively implemented.
- Ensure all persons who have a role in the management of legionella or the implementation of control measures are competent to do so, including through the provision of training.
- Where the results of any biological monitoring show the presence of legionella bacteria in water systems in concentrations liable to cause harm to human health, ensuring all employees or persons who may have been exposed are informed of this exposure in a timely manner.
- Ensure there are arrangements in place to deal with accidents, incidents and emergencies for the protection of all persons and to be able to return the situation to normal working conditions.
- Ensure where a water system is out of specification and poses a risk to health, that EHSS is informed in a timely manner.
- Ensure suitable records about the management of legionella risk are maintained.
- Ensure effective communications between all persons who have a role to play in the management of legionella risk.

This letter of appointment is valid for a period of 1 year.



Signed Derek Watson, Quaestor and Factor _____

Date 1 February 2023 _____

University of St. Andrews - The control of legionella risk in water systems
Policy Statement and summary Management and Operational Arrangement

Schedule 4 - Letter of acceptance of appointment as Deputy Responsible Person - Legionella

I Hereby accept appointment to the role of Deputy Responsible Person – Legionella for the University of St Andrews as detailed in your letter of appointment dated _____. I acknowledge and understand the duties associated with the role and that, in the event of the absence of the Responsible Person this appointment delegates the authority from the Principal to me in order to discharge these duties.

Signed _____, Estates Head of Technical Services

Date _____

Schedule 5 - Letter of appointment for Deputy Responsible Person (Residential Leased Properties) - Legionella

The University of St Andrews, hereby appoints in writing the person of Scott Robertson, Residential Business Services, Student accommodation Services, Property Manager to discharge the role and responsibilities of the *Deputy Responsible Person (Residential Leased Properties)* as described in the policy document [Control of Legionella Risk in Water Systems](#). These include to assist and deputise for the *Responsible Person* as appropriate in:

- The development of a legionella management plan detailing how legionella risk will be managed across residential leased properties managed by the University.
- Ensure a suitable and sufficient legionella risk assessment is held for all water systems in residential leased properties.
- Ensure there is a written scheme developed from each legionella risk assessment, detailing how each residential leased property will be managed.
- Ensuring that suitable arrangements are in place, including information, equipment and personnel to manage the risks and implement the control measures identified in the risk assessments and written schemes for residential leased properties.
- Ensuring suitable arrangements are in place to ensure all parts of the water systems are under a relevant programme of inspection and maintenance in residential leased properties. Where defects are detected liable to cause harm or ill health, these can be remedied immediately or steps taken to make safe.
- Ensuring that for residential leased properties there is an appropriate regime for biological monitoring of any water systems not fully under control, and that it is effectively implemented.
- Ensure all persons who have a role in the management of legionella or the implementation of control measures in residential leased properties are competent to do so, including through the provision of training.
- Where the results of any biological monitoring in residential leased properties show the presence of legionella bacteria in water systems in concentrations liable to cause harm to human health, ensuring all employees or persons who may have been exposed are informed of this exposure in a timely manner.
- Ensure that for residential leased properties there are arrangements in place to deal with accidents, incidents and emergencies for the protection of all persons and to be able to return the situation to normal working conditions.
- Ensure that for residential leased properties where a water system is out of specification and poses a risk to health, that EHSS is informed in a timely manner.
- Ensure that for residential leased properties suitable records about the management of legionella risk are maintained.
- Ensure that for residential leased properties effective communications between all persons who have a role to play in the management of legionella risk.

This letter of appointment is valid for a period of 1 year.



Signed Derek Watson, Quaestor and Factor _____

Date 1 February 2023 _____

Schedule 6 - Letter of acceptance of appointment as Deputy Responsible Person (Residential Leased Properties) - Legionella

I Hereby accept appointment to the role of Deputy Responsible Person (Residential Leased Properties) – Legionella for the University of St Andrews as detailed in your letter of appointment dated _____. I acknowledge and understand the duties associated with the role and that, in the event of the absence of the Responsible Person this appointment delegates the authority from the Principal to me in order to discharge these duties.

Signed _____, Residential Business Services, Student Accommodation Services,
Property Manager

Date _____