

What to Expect During a Cooling Tower System Inspection

All New York City cooling tower systems are inspected routinely by the New York City Health Department's Office of Building Water Supply Oversight. During an inspection, health inspectors evaluate cooling tower systems for compliance with New York City regulations found in [Chapter 8 in Title 24 of the Rules of the City of New York](#) [24 RCNY Chapter 8] and [Local Law 77](#).

Before an Inspection

- Have the maintenance program and plan (MPP) and all operational records readily available. Make sure that all documentation is organized and complete.
- Make sure that Health Department staff are given access to the cooling tower system, including all towers, treatment rooms, equipment and related records.

During an Inspection

Health inspectors will arrive at your building and request to meet with the building manager, lead engineer, superintendent or whoever is responsible for cooling tower maintenance on site. They will then conduct a visual inspection of the cooling tower system to make sure the registration information the Health Department has for your cooling tower system is correct. The inspection findings will be captured electronically.

Health inspectors will assess the quality and completeness of these four components of a cooling tower system:

- **Maintenance Program and Plan (MPP).** For more information about MPP requirements, see [Building Your Cooling Tower System's Management and Maintenance Team](#), [Building an MPP Team Checklist](#) and [Cooling Tower Compliance Guidance Document](#).
- **Operational Records.** At the time of the inspection, you must make all records related to cooling tower management and maintenance available to health inspectors. On-site records include dates and documentation of the following: system startup and shutdown procedures; cleaning and disinfection; chemical treatment; water-quality monitoring; testing of bacteriological indicators and *Legionella* cultures; and any follow-up response or corrective actions, monitoring, maintenance, and compliance inspections.
- **Treatment System.** Health inspectors will check to see that operations in the treatment room are consistent with the treatment methods and biocides/chemicals described in the MPP. For more information about treatment requirements, see [Water Treatment Guidance for Cooling Tower Systems](#).

- **Cooling Tower System.** Health inspectors will evaluate accessibility of the systems, makeup water source, overall conditions and cleanliness. They will also check whether registration numbers are posted on each tower.

After an Inspection

Once the inspection is completed, the health inspectors will review the inspection report (IR) with an on-site representative and obtain their signature before leaving. The IR will be emailed to:

- The cooling tower system permission owner (person who registers the cooling tower system and uploads documents onto the [NYC Cooling Tower Registration Portal](#))
- Building permission owner
- On-site representative (if their email was provided at the time of inspection)
- Building owner (if their email is provided in the Registration Portal)

For any violation seen at the time of inspection, a summons will be served to the building owner by postal mail.

Frequently Asked Questions

1. *Can I schedule my inspection?*

No, general inspections are unannounced and not scheduled.

2. *How long will an inspection take?*

An inspection can range from a few hours to multiple days. The time varies depending on the size and complexity of the cooling tower system(s), how well organized and complete the documentation is, and whether any issues come up during the inspection.

3. *What should I do if my MPP or my operational records are kept at my treatment vendor's office?*

In accordance with Chapter 8 in Title 24 of the Rules of the City of New York, Sections 3 and 7a [24 RCNY §8-03 and §8-07(a)], the MPP and operational records must be kept in the building where the cooling tower is located or in an adjacent building or structure on the same campus, complex, lot or on-site central engineering division. Documents must always be available to facility staff.

4. *Can I keep my MPP and records in an electronic or online format?*

Yes. If records are kept electronically or online, any record requested by health inspectors must be made accessible on a digital device (for example, computer or tablet) provided by the facility at the time of inspection. You must have a person on site who can assist inspectors with the electronic platform (for example, provide a password if needed). Inspectors are not responsible for accessing records from their own devices.

If requested by the health inspectors, you must also make electronic records available as printed paper copies or as an uneditable electronic file, such as a portable document format (.pdf) or digital image (.jpeg or .tiff), emailed to the Health Department at the time of inspection.

5. *Does my water treatment vendor need to be present for the inspection?*

No, your water treatment vendor does not need to be present for the inspection. The Health Department recommends that you work with the treatment vendor to keep the MPP and operational records up to date, since health inspectors will be reviewing this information at the time of inspection. If the water treatment vendor has questions, they can email the Health Department at CTCompliance@health.nyc.gov.

6. *What if the health inspectors meet with someone other than the correct, on-site contact at our building?*

Someone with access to the cooling tower system's documents and equipment should always be available during normal business hours (Monday through Friday; 8 a.m. to 5 p.m.). To avoid issues, make sure that building staff know who to contact when health inspectors are on site.

7. *What if my registration information is inconsistent with my system setup?*

If your registration information is inconsistent with your system setup, the health inspectors will explain the issue and request that the building owner speak to their qualified person(s) and make the necessary changes. You can email any questions about registration to the Health Department at CTcompliance@health.nyc.gov.

8. *What if health inspectors come to inspect when my system is turned off?*

The Health Department conducts inspections year-round. If a system is turned off during an inspection, the health inspectors will assess whether the system is in proper shutdown mode and consistent with the procedures outlined in the MPP. Startup and shutdown dates must be indicated in your operational records.