

## **Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** cbarnett@healthyschools.org (CDC healthyschools.org)  
**Sent:** Monday, July 11, 2011 12:27 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** cbarnett@healthyschools.org (CDC healthyschools.org)  
**Subject:** comment - 238 - NIOSH Indoor Environmental Quality (IEQ) Alert- Dampness

NIOSH Mailstop: C-34  
Robert A. Taft Lab.  
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Cincinnati, Ohio 45226

Thank you for the opportunity to comment on the new NIOSH "Preventing Occupational Respiratory Disease from Exposures caused by Dampness...".

The fact sheet is improved over an early version of last fall, but still lacks user-friendly and sufficiently clear directions on risks and how to avoid problems, or how to avoid making matters worse.

### **Accessible text.**

First, edit the fact sheet to a 5-6 th grade reading level. It is not reasonable for NIOSH professional staff to assume that in the current text will be accessible to white collar or even most building owners and occupants, especially those working in government offices, k-12 schools and child care facilities, nor will it be helpful to parents or families of children who are building occupants.

### **Respiratory v other symptoms.**

I understand that NIOSH receives 'overwhelming' complaints about respiratory problems associated with building dampness, but contributing to that is possibly public agencies' stressing only respiratory problems and not listing other health symptoms that might be reported or recorded.

In the interest of preventive public health and in case-finding that will benefit all NIOSH work and indoor environments research, please list all the symptoms that appear in the peer-reviewed published literature including: neurologic symptoms, fatigue, difficulty concentrating and headaches, as well as skin symptoms such as rashes. These should be listed on the user-friendly fact sheet and appropriately footnoted in the accompanying technical memo. NIOSH focuses on respiratory health because that is the primary complaint, but it will not ever be the only complaint.

### **Children.**

The draft text edit to include "children" as "other occupants" is deeply misleading to the intended readers and unfair to parents and community (the voters). Children are more at risk than other occupants of damp buildings.

The current draft text inadequately addresses their occupant health needs. Children breathe more air per pound of body weight, cannot identify threats or articulate symptoms, nor are their parents/families educated about occupational health hazards in k-12 schools or child care facilities. Since children vastly outnumber adults in these settings, and since asthma is the leading cause of school absenteeism, and since CDC/NIOSH is a public agency covered by Federal Executive Order 13045 on risks to children's health, NIOSH should explicitly identify children as an important and often overlooked majority set of occupants with special behavioral and biological characteristics, in the user friendly fact sheet and in the extensive supporting memo.

### **Inform all occupants.**

The draft text is inadequate to ensure that parents/families are informed. Schools do not routinely share environmental-occupational health information with adult workers or with parents whose children are also

exposed or at risk. NIOSH should be explicit that children have unique characteristics and that their parents and health care providers should have the same information that is given to adult workers and managers-owners.

Preliminary data from a 2010 online survey of nearly 400 school nurses found that 40% knew children who were affected by indoor pollutants in schools and that 75% reported schools ignored the problems (NASN Jan 2011). Nurses also reported that they less likely to discuss environmental hazards with parents than they were with school administrators; they also did not necessarily believe that environmental health information was welcomed by administrators. NIOSH is a public health agency; NIOSH can help break the silence.

### **Investigation and remediation steps.**

- 1- The list will be more helpful if it is re-ordered to prompt owners to look at the outside of the building and fix the building envelope or site plan prior to doing interior repairs. Buildings with holes in roofs, pooling water outside, water staining under windows or eaves will be damp. As currently drafted a building owner might remove and replace ceiling tiles that are water damaged but never fix the roof that caused the damage.
- 2- Add cautions against inappropriate remediation, such as against painting over water damaged materials, adding room fresheners to mask musty odors, applying disinfectants or fungicides to damp or moldy surfaces.
- 3- Add simple caution about using PPE and against using untrained workers for larger remediations (give est ft2 or illustrate)

Thank you, if you have any questions, please call.

Claire Barnett



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[www.HealthySchools.org](http://www.HealthySchools.org)  
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