

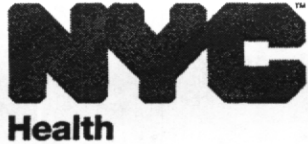
**Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** Eva Mendoza [EMENDOZA@health.nyc.gov]  
**Sent:** Tuesday, July 12, 2011 5:03 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Thomas Merrill; Roslyn Windholz  
**Subject:** 238 - NIOSH Indoor Environmental Quality (IEQ) Alert  
**Attachments:** NIOSH ALERT - Preventing Occupational Respiratory Disease from Exposures caused by Dampness in Office Buildings, Schools and Other Nonindustrial Buildings.pdf; ATT00001.txt

Good Afternoon:

Attached please find comments regarding the above mentioned matter.



NEW YORK CITY DEPARTMENT OF  
HEALTH AND MENTAL HYGIENE  
Thomas Farley, M.D., M.P.H.  
*Commissioner*

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July 12, 2011

[nioshdocket@cdc.gov](mailto:nioshdocket@cdc.gov)

Re: Preventing Occupational Respiratory Disease from Exposures caused by Dampness in Office Buildings, Schools and Other Nonindustrial Buildings

To Thom It May Concern:

The New York City Department of Health & Mental Hygiene (DOHMH) has reviewed the NIOSH Alert: Preventing Occupational Respiratory Disease from Exposures caused by Dampness in Office Buildings, Schools and Other Nonindustrial Buildings and has the following comments.

Page 4, Line 24 – The respiratory outcomes have been the most thoroughly studied, while the least studied are the possible health effects, such as neurological damage, attributed to fungal toxins (mycotoxins). We suggests adding some specific symptoms attributed to mycotoxin exposure which would provide more information and keep the format consistent with rest of the paragraph

Page 4, Line 45 – We suggest replacing “moldiness” with “mold growth”

Page 15, Lines 16-22 – We suggest removing removing specific reference to graduated remediation procedures. We believe this is too much detail for this document and may lead the reader to ascribe levels of protection and containment well beyond those proscribed by the EPA document. We suggest the following:

“For example, the EPA recommends increasing levels of containment [of the area and use of respirators] and [other] personal protective equipment (PPE) by remediation workers for affected areas smaller than 10 square-feet, larger than 10 square-feet, and larger than 100 square-feet [EPA 2001]. [Containment is accomplished by (1) isolating the affected area with polyethylene sheeting, (2) using HEPA-filtered exhaust ventilation to maintain negative air pressure within the enclosure (to prevent contaminants from migrating to other areas of the building), and (3) sealing off HVAC system ducts within the isolated area]. Damaged materials that are to be removed from the containment area should be sealed in plastic bags or within polyethylene sheeting [for removal from the containment area].”

We appreciate the opportunity to comment on this document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Th Merrill', with a long horizontal flourish extending to the right.

Thomas Merrill  
General Counsel