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American Industrial Hygiene Association

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March 11, 2003

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Dear Representative Kolb,

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Recently you received comments (enclosed) from Aaron Trippler of the American Industrial Hygiene Association (AIHA) and David Huizen, President, Western Michigan Industrial Hygiene Society (WMIHS) on Michigan House Bill 4094, "toxic mold protection act". The Michigan Industrial Hygiene Society (MIHS) concurs with these comments on the bill offered by AIHA through Mr. Trippler and by WMIHS through Mr. David Huizen.

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MIHS is one of the oldest local sections of the AIHA representing environmental health and safety professionals throughout the Central and Southeast Michigan area. As one of the largest local sections in the Midwest our membership represents professionals from manufacturing, consulting, government, and academia that work to enhance the health and safety of workers throughout Michigan.

Andrew Berryman

Robert Cleghorn, CIH

Scott Hoag, CIH

Our members are concerned with protecting workers from exposure to hazardous substances including biological materials such as fungi, mold, and toxic byproducts from biological materials.

Nancy McClellan

Sarunas Mingela, CIH

Our members wish to reiterate that we do not feel at the present time, based on current scientific research, it is possible to define or set permissible exposure limits for mold. The MIHS is concerned about standards for individuals involved with recognition, evaluation and control of mold. Our members agree with the position of the AIHA that only qualified/accredited laboratories should be used to correctly analyze samples collected as part of the investigation.

Suzanne Monahan, CIH

Laura Randall, CIH

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The current recommended practice in mold evaluation promotes comparisons in total and type of biological contamination in the area where symptoms are occurring and an area (outside) where symptoms are not present. This has been a proven cost effective method of predicting mold contamination and a need for remediation. More extensive testing to determine specific types and toxins of mold can be performed; however, in most cases this type of information adds little to the overall identification, control, and remediation of biological contamination than a comparison evaluation that indicates a mold problem.

MIHS wants to reiterate AIHA's comments regarding the qualification of individuals involved with inspection, assessment, analysis, and remediation of mold. Many of our members are well qualified to perform mold evaluations as well as oversee its proper remediation based on their educational background and experience gained in the field. Many of our members are currently performing mold evaluations in a competent and ethical manner throughout Michigan. We, like AIHA, believe you should include minimum levels of competency for individuals performing mold evaluations.

If you have any questions on the above comments please feel free to contact me (586) 615-9687.

Sincerely

Timothy J. Kearney
President - Michigan Industrial Hygiene Society

Cc: Aaron Trippler