

March 11, 2003

Representative Chris Kolb  
Michigan House of Representatives  
P.O. Box 30014  
State Capital  
Lansing MI 48909-7514

Dear Representative Kolb,

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

WMIHS is a local section of the AIHA representing environmental health and safety professionals in the West Michigan area. Our membership represents a wide array of professionals from manufacturing, consulting, government, and academia that work everyday to enhance the health and safety of workers in Michigan.

When performing industrial hygiene duties, 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.

Our members would like to reiterate the comment 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 current recommended practice in mold evaluation promotes simple 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 simple comparison evaluation that indicates a mold problem.

We also want 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 these individuals are currently performing mold evaluations in a competent and ethical manner in the West Michigan area. 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.

Sincerely

Davild L. Huizen  
President Western Michigan Industrial Hygiene Society

Cc: Aaron Trippler