

MOLD REMEDIATION: How Complex Should It Be?



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Remediation Objectives



1. **Restore building conditions.**
2. **Re-establish conditions acceptable to most occupants population.**
3. **Protect sensitive individuals to the extent possible.**
4. **Eliminate “toxic” molds???**

Historical Development

A decorative graphic consisting of a horizontal bar with a color gradient from dark blue on the left to bright yellow on the right. To the right of the bar is a large, dark, comet-like tail that tapers to a point.

Early Approaches:

- routine maintenance issue
- general sanitizing procedure
- initial IAQ recommendations
- infection control
- systematic abatement

Hysterical Development



- Emergence of the “toxic mold” theory
- NYC *Stachybotrys* Guidelines
- Health Canada
- AIHA Field Guide

The Pendulum Swings Back



- Revised NYC Guidelines
- EPA
- CDC

Defining the Scope of Work



- “Do you want to be a mold millionaire?” (plaintiff’s version)
- “Do you want to be a mold millionaire?” (defendant’s version)
- Toxic mold assumptions vs. reality

Must All Mold Be Removed?

- **Removal vs. Treatment**
- **Example:** When repairs must be delayed
- **Example:** Where mold must be left in place

Worker Protection



- **Basis of current recommendations**
- **Respiratory Protection Program = Catch 22**
- **Use of disposable respirators**

Selecting Remediation Controls



Primary Objectives:

- Protect occupants from exposure during process
- Return building surfaces to pre-existing sanitary condition
- Prevent Containment Migration?
- To bleach or not to bleach?

Alternatives to Full Containment:



- **Critical barriers**
- **Portable HEPA filters**
- **Vacate a large buffer zone**
- **Work when building vacant**
- **Enhanced cleaning of surrounding areas**

Project Oversight



- **Establish work practices**
- **Periodic inspection (visual indicators)**
- **No testing (except to verify pilot project)**

Protecting Occupants

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- **More stringent controls needed for bona fide sensitive individuals.**
- **Less control acceptable where exposure will be negligible**
- **When is building evacuation needed?**

Verifying Remediation



- **It's Groundhog Day Again! (breaking the test/fail cycle)**
- **Why false negatives?**
- **Why false positives?**
- **Option A: clearing without tests**
- **Option B: testing pilot project only (realistic criteria)**

How Complex Should It Be?



- **Typical “toxic” mold scenario**
- **Reality-Base Remediation:**
 - minor cleanup
 - moderate controls
 - most stringent approach



THAT'S ALL FOLKS !