

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, June 29, 2014 8:00 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 29, 2014 - 20:00

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

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Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
Is Mold Dangerous?

Mold Industry Regulation is about public health and safety, in residences, commercial buildings, and in public schools!!!

Per the US Environmental Protection Agency, <http://www.epa.gov/mold/moldcourse/chapter1.html>

Inhalation exposure to mold indoors can cause health effects. Molds produce allergens (substances that can cause allergic reactions), irritants, and, in some cases, potentially toxic substances or chemicals (mycotoxins). Inhaling or touching mold or mold spores may cause allergic reactions in sensitive individuals. Mold does not have to be alive to cause an allergic reaction.

Dead or alive, mold can cause allergic reactions in some people.

Allergic Reactions, Asthma Attacks, Irritant Effects Allergic reactions to mold are common and can be immediate or delayed.

Repeated or single exposure to mold, mold spores, or mold fragments may cause non-sensitive individuals to become sensitive to mold, and repeated exposure has the potential to increase sensitivity. Allergic responses include hay fever-like symptoms such as headache, sneezing, runny nose, red eyes, and skin rash (dermatitis). Molds can cause asthma attacks in people with asthma who are allergic to mold. In addition, molds can irritate the eyes, skin, nose, throat, and lungs of individuals whether or not they are allergic to mold.

Other Health Effects

Breathing in mold may also cause hypersensitivity pneumonitis, an uncommon disease that resembles bacterial pneumonia. In addition, mold exposure may result in opportunistic infections in persons whose immune systems are weakened or suppressed.

When mold grows indoors, the occupants of a building may begin to report odors and a variety of symptoms including headaches, difficulty breathing, skin irritation, allergic reactions, and aggravated asthma symptoms. These and other symptoms may be associated with exposure to mold.

Mycotoxins and Health Effects

As molds grow, some (but not all) of them may produce potentially toxic byproducts called mycotoxins under some conditions. Some of these molds are commonly found in moisture-damaged buildings. More than 200 mycotoxins from common molds have been identified, and many more remain to be identified. The amount and types of mycotoxins produced by a particular mold depends on many environmental and genetic factors. No one can tell whether a mold is producing mycotoxins just by looking at it. Some mycotoxins are known to affect people, but for many mycotoxins little health information is available. Research on mycotoxins is ongoing. Exposure to mycotoxins can occur from inhalation, ingestion, and skin contact. It is prudent to avoid unnecessary inhalation exposure to mold.

More than 200 mycotoxins have been identified from common molds, and many more remain to be identified.

The EPA also states, "For more detailed information on mold and its health effects, consult a health professional. You may also wish to consult your state or local health department."

Did you know that more than 90% of the biological weapon research today involves mycotoxins produced by "toxic" mold.

The Mold Regulatory Program by the DSHS is no different than the Asbestos and Lead Programs. This program is related to public health and welfare.

Just last year, an elementary school right here in Round Rock was shut down because children were getting sick, and a Texas Licensed Mold Assessment Consultant found a serious mold problem in the school.

Other states are doing more regulation and licensing, not less, including Florida, New York, California, Washington, Minnesota, North Carolina, Oklahoma, Louisiana, and others.

Sunset staff also considered whether national standards or a nationally recognized accrediting body for the profession or practice exists when suggesting programs for deregulation.DSHS' mold assessment and remediation program is another case in point. While state law allows Texas homeowners and owners of properties with less than 10 residential dwelling units to take mold samples and perform mold clean up without a license, the State requires DSHS to license and regulate individuals, companies, and laboratories that perform this function. Texas is one of the few states to adopt licensing requirements for mold businesses, but several indicators suggest this program is redundant and unneeded.

The U.S. Environmental Protection Agency provides guidance for mold remediation in structures; the American Industrial Hygiene Association a national entity, provides certification of mold assessors; and multiple other private sector trade groups train and certify mold remediators. This argument could be used for almost every profession with a license! However, the statement that the AIHA provides certification for mold assessors, is not true or accurate. It is true that there are many private sector groups offering certifications for mold inspectors and mold remediators. The truth, however, is that I could get on my laptop in the back of the room here, and get online with one of several groups, and in 2 hours become a "certified mold inspector." Is this the alternative that we want here in Texas?

With the current regulations, the public can be assured that all involved are properly trained and insured; there is no such guarantee without regulation.

Many remember the days before regulation and are reminded of the chaos, panic, poor workmanship, financial losses, and scams that abounded.

Regulations have allowed the professionals to rise above the past and stand out. Texans have benefited greatly by the regulation of mold. Texas will be taking a step backwards if you deregulate mold assessors and mold remediators. All the time I hear from my customers that they have heard that mold remediation costs \$100,000 or that their home could be condemned. This is the nature of our past!

My company is in 8 states, and Texas is the only one out of the 8 with Licensing. I have seen countless numbers of companies use extreme fear tactics to scare consumers, then swindle them. Inside Edition and many other TV news shows have done sting operations to show how unscrupulous unlicensed mold inspectors and mold remediators can be. Parents are easily scared when their children are sick. I do not believe it is right to have people, Texas consumers preyed upon in this way.

Mold health problems are real! But, we must make sure that licensed, responsible, ethical professionals are working in this field. With no Enforcement, anything goes.

DSHS Goal #4 – Protect Consumers. The only way to protect consumers in this case is to regulate.

The DSHS Regulatory Philosophy is to ensure protection of public health and safety.

The Mold Regulations “ensure that mold assessors and remediators are following minimum standards that protect the health of workers and occupants.

Mold is a public health concern! This program is a state level, community health program! No federal agencies regulate or oversee this profession or this health concern, but only offer guidance.

Among other things, the DSHS Mold Program does the following:

1. Establishes and oversees minimum work standards;
2. Establishes and regulates a code of ethics;
3. Requires and enforces mold assessors and remediators are insured;
4. Restricts conflicts of interest, which is a proven concept.

Thank you.

Nathan Camp

Any Alternative or New Recommendations on This Agency: Move mold, lead, and asbestos departments from DSHS to TECQ. Even though these things affect human health, all of the actions (sampling, monitoring, and remediation, abatement) are "environmental." TECQ might be better equipped to handle the rules, regulations, and oversight to make these programs more effective.

My Comment Will Be Made Public: I agree