

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 24, 2014 3:55:34 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 11:26 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 11:25

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: steve

Last Name: Hulka

Title: Certified Industrial Hygienist (CIH-ABIH)

Organization you are affiliated with: Greater Houston Industrial Hygiene Council (however, I am not officially representing the GHIHC with my comments)

City: League City

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Re: Deregulation of mold remediation and mold assessors qualifications.

Deregulating the qualifications (licensing) of mold assessors is a bad idea.

It is true that the EPA and AIHA organizations provide detailed guidance for mold remediation and air and surface testing but these are only good scientifically based "guidelines". Without a regulation that requires the use of these recommendations, there are individuals and companies who will circumvent the use of good science and procedures which will be detrimental to the health of people who use school buildings, public buildings and private buildings and apartment complexes. Circumvention is driven by profit margin; the more careless mold remediation and testing is performed, the higher the net profit. The extra costs for doing the job right are warranted by the assurance that occupants returning after remediation are not exposed to residual mold in the air and on surfaces. Licensing assures the competence of those in the business and assures that proper procedures are used which prevents the negative impact to the health of remediation workers and returning occupants. Allowing remediation companies to "police" themselves, as in doing the post remediation testing, will lead to procedural "short cutting", incomplete remediation, and the resultant negative impact to public and private health. I do not work in the mold remediation business at this time but I have had responsibilities in my career to influence how asbestos and mold remediation was done in the work areas at companies I have worked for. I know how remediation is supposed to be done. EPA guidelines are based on good science but if the guidelines are not followed, serious health problems can and will result. Regulations are absolutely necessary in assuring that this kind of work is done properly. Thank you for reviewing regulations that are cumbersome and unnecessary but this one should not be relaxed.

Any Alternative or New Recommendations on This Agency: The amount of "enforcement" opportunities an agency

has engaged in should not be a criteria for whether a regulation is good or not. The threat of litigation for not following the rules is a good hammer for doing the job right.

My Comment Will Be Made Public: I agree