

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 18, 2014 1:15:04 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 18, 2014 12:51 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 12:51

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Thomas

Last Name: Palet

Title: President

Organization you are affiliated with: HP Envirovision

City: Grand Prairie

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: My comment is in regards to discontinue of the Mold Licensing Program. I support the program only if it would be continued as a service under the current Asbestos program. Most materials with mold growth typically involve asbestos materials as a substrate (i.e. sheetrock). To prevent the spread of mold spores and to ensure public safety the Mold program should be incorporated into the Asbestos program by requiring those firms whom wish to engage in Mold Remediation in addition to Asbestos Abatement have an additional 4 hour awareness on controlling and removing materials with Mold. It could be a simple designation on the Asbestos license and an additional fee paid for those wanting to engage in Mold Remediation. By completely deregulated you will be putting the fate of compliance in the hands of regular contractors whom may be more likely not to even consider the strong possibility of testing for asbestos before removing Mold materials. The industry and general public would be best served by the current Mold regulation being revised and incorporated into the current asbestos regulations.

Any Alternative or New Recommendations on This Agency: I support the program only if it would be continued as a service under the current Asbestos program. Most materials with mold growth typically involve asbestos materials as a substrate (i.e. sheetrock). To prevent the spread of mold spores and to ensure public safety the Mold program should be incorporated into the Asbestos program by requiring those firms whom wish to engage in Mold Remediation in addition to Asbestos Abatement have an additional 4 hour awareness on controlling and removing materials with Mold. It could be a simple designation on the Asbestos license and an additional fee paid for those wanting to engage in Mold Remediation. By completely deregulated you will be putting the fate of compliance in the hands of regular

contractors whom may be more likely not to even consider the strong possibility of testing for asbestos before removing Mold materials and potentially releasing large amounts of mold spores and asbestos into the public environment. The industry and general public would be best served by the current Mold regulation being revised and incorporated into the current asbestos regulations.

My Comment Will Be Made Public: I agree

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 20, 2014 1:01:27 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 20, 2014 11:13 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 11:12

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Thomas

Last Name: Palet

Title: President

Organization you are affiliated with: HP Envirovision

City: Grand Prairie

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: This reply is in regards to the proposal to discontinue the DSHS regulations regarding Mold Remediation

Any Alternative or New Recommendations on This Agency: It appears on the surface that the reason the agency is looking to discontinue the program is that it is becoming a financial burden to the agency to enforce. If this is the case, it should be first considered if the program is a necessity. We feel the program is vital to the protection of the general public from the potential health affects from exposure and also because most mold growth occurs / grows on asbestos containing materials (i.e. wallboard with asbestos texture or joint compound, and ceiling tiles) that have become water damaged. By deregulating, it will lead to more owners and non-licensed contractors removing these materials without consideration to exposure for mold spores or even addressing asbestos. It is our opinion, that the best way to manage mold exposure is to incorporate a provision into existing asbestos regulations so that it can be managed with current staff, thus, become cost efficient to manage and preventing exposure of the general public to both asbestos and mold. It will also eliminate the need to file a notice for mold work and asbestos on the same project.

My Comment Will Be Made Public: I agree