

**Department of
Veterans Affairs**

Memorandum

Date: March 18, 2022

From: Interim Medical Center Director (001/657A4)

Subj: OSHA Inspection 1548989

To: William McDonald, CSP, Area Director

On February 2, 2022, our facility received the Hazard Alert Letter and air sampling results for the above subject inspection. The notice indicated that there were some areas of recommendations to further assist our facility in continuing to reduce or eliminate exposures.

The following are our responses to the recommended elements:

1. Prevent mold growth in occupied areas -

a. Regular checks of the building envelope and drainage systems should be made to assure that they are in working order. **Facility Management Services (FMS) is in the process of the development of a quarterly preventative maintenance (PM) schedule to ensure roof drains are inspected quarterly and cleaned as necessary. Anticipated completion date is the third quarter fiscal year 2022.**

b. Identify and, to the extent possible, eliminate sources of dampness, high humidity, and moisture to prevent mold growth. **As a part of the FMS on-call system (54FMS/ 54367) once facility staff recognizes a concern such as dampness, high humidity, moisture, etc., and a work order is entered, maintenance and operations (M&O) staff will respond to the area of concern. Additionally, the facility has a Water Intrusion and Mold Management (WIMM) program and training will be provided to relevant staff on the steps and procedures to take in should a water intrusion event occur.**

c. Wet or damp spots and wet, non-moldy materials should be cleaned and dried as soon as possible (preferably within 24 to 48 hours of discovery). **As a part of the FMS on-call system (54FMS/ 54367) once facility staff recognizes a leak, dampness, high humidity, moisture, etc., and enters a work order, maintenance and operations staff will respond to area of concern. As of January 1, 2022, there have been 88 work orders submitted for various deficiencies. Of those 88, 29 were directly related to ceiling tile damage and/or stained ceiling tiles due to water leaks. Currently, three work orders**

remain in the "in-progress" state. Steps to take after water intrusions will be covered in training staff on the WIMM program, to include response times.

d. Moisture due to condensation may be prevented by increasing the surface temperature of the material where condensation is occurring, or by reducing the moisture level in the air (humidity). Besides the monitoring system in place (Temp-Trak), should there be a concern, the Industrial Hygienist (IH) would also respond with equipment (thermal imager, moisture meter, air quality meter, etc.) to verify conditions. If an investigation is warranted, the facility has an indoor air quality policy and standard operating procedures to follow when investigating indoor air quality concerns. Current infrastructure does not allow for controlling humidity in most of our air handlers on site. We have several construction projects currently in design phase to replace outdated air handlers throughout the main facility including the laboratory.

For HVAC, FMS staff perform monthly PM on all air handlers for JJPVAMC. The PM consists of inspecting, cleaning, and replacing filters. A monthly PM log has been developed to document these PMs through the work orders that have been placed by HVAC staff. We began tracking the work orders that have been placed for air handler PMs in month of March. Currently there are 10 work orders for PMs for a total of 38-man hours.

2. Prevent mold and bacterial growth in the buildings ventilation system –

a. A preventive maintenance plan should be put into place for each major component of the building's ventilation system. Filters are changed monthly on a set schedule. A new SOP is currently enroute for FMS pending review and signature. Air coils are cleaned semi-annually. Vent diffusers cleaned as needed. For HVAC, FMS staff perform monthly PM on all air handlers for JJPVAMC. The PM consists of inspecting, cleaning, and replacing filters. A monthly PM log has currently been developed to document these PMs.

b. Contact the equipment supplier or manufacturer for recommended maintenance schedules and operations and maintenance manuals. A phone call was made to the manufacturer, and they stated that maintenance should be conducted every 3 months. We perform maintenance monthly.

c. Components that are exposed to water (e.g., drainage pans, coils, cooling towers, and humidifiers) require scrupulous maintenance to prevent microbial growth and the entry of undesired microorganisms or chemicals into the indoor air stream. For HVAC, FMS staff performs monthly PM on all air handlers for JJPVAMC. The PM consists of inspecting, cleaning, and replacing filters. A

monthly PM log has currently been developed to document these PMs. PM procedure AC001 Step 10 specifies to clean condensate pans as needed. Further, HVAC staff installs controlled release biological growth inhibitor in the condensate pans, as needed.

3. Cleaning the building's air ducts -

a. All components of the system must be cleaned. Failure to clean a component of a contaminated system can result in re-contamination of the entire system. **For HVAC, FMS staff performs monthly PM on all air handlers for JJPVAMC. The PM consists of inspecting, cleaning, and replacing filters. A monthly PM log has currently been developed to document these PMs.**

b. Water-damaged or contaminated porous materials in the ductwork or other air handling system components should be removed and replaced. **FMS has identified the need for replacement of our HVAC systems. We have several projects currently in the construction design phase to replace outdated air handlers and associated duct work that currently do not meet VA HVAC design guidelines.**

c. Ventilation system filters should be checked regularly to ensure that they are seated properly. Filters should be replaced on a routine schedule. **For HVAC, FMS staff performs monthly PM on all air handlers for JJPVAMC. The PM consists of inspecting, cleaning, and replacing filters. A monthly PM log has currently been developed to document these PMs. FMS has identified a past practice where FMS staff has replaced HVAC filters while the unit was in operation. This has been corrected with a new SOP that clearly specifies the steps to take to properly perform maintenance of the air handling unit.**

4. Protect building occupants during building renovations or remodeling –

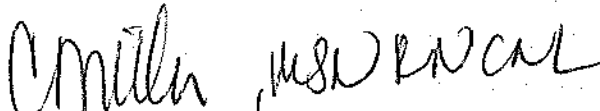
a. Establish appropriate containment and worker protection program. **We have an extensive safety plan and Environment of Care program. Weekly EOC rounds are made throughout the healthcare system, to include regular rounds at the Community Based Outpatient Clinics. Infection Control Risk Assessment (ICRA) are established for all construction locations. All projects are scrutinized per the ICRA requirements, reviewed by the Infection Control Nurse, and signed off by additional members of the team. Based on the ICRA requirements, the contractor is required to provide negative air, construction containments, critical barriers and/or construction barriers according to the final ICRA.**

5. Select a qualified professional who can assist in providing a safe and healthful work environment -

a. Provide a training program for all employees, including temporary employees, contractors, and part-time employees, regarding the health effects associated with fungi growth, symptoms of fungi related illnesses, and methods to identify and report fungi growth hazards. **The Veterans Affairs has a Mold Awareness course (NFED_ehs_hsf_d99_sh_enus) in the Talent Management System that can be used to train all employees. Employees are encouraged to contact Employee Occupational Health (EOH) and/or file ECOMP if the employee feels they have been exposed to any health hazards at work. Current Standard Operating Procedure for annual communications between supervisors and staff is currently being routed for detailed review and signature.**

b. Establish a screening program to identify health conditions aggravated by exposure to fungi growth. **We have an active EOH service. Employees who have concerns are encouraged to report health issues to EOH at any time. Employees are also provided PPE if there is a reasonable accommodation request for any individuals that require additional PPE due to an allergy or sensitivity to fungi growth.**

Thank you for the opportunity to work with your staff to continue our improvement journey. If you have questions or need additional information, please contact Kimberly Adkins Associate Medical Center Director, at 573-686-4151.



Chandra Miller, MSN, RN, CNL

Attachment