



January 28, 2022

Kimberly S. Adkins, MSSL
John J. Pershing VA Medical Center
1500 N. Westwood Blvd.
Poplar Bluff, MO 63901

Re: Inspection No. 1548989

Dear Ms. Adkins

The Occupational Safety and Health Administration (OSHA) conducted an onsite inspection of the workplace at 1500 N. Westwood Blvd. Poplar Bluff, Missouri, 63901 on August 19, 2021. The inspection was in response to a complaint alleging employee exposure to mold (fungi) in the Hematology, Chemical and Blood Bank rooms of the laboratory. The inspection included a review of the submitted documents, results from two third party contractors who conducted mold sampling, two sampling events conducted by OSHA, as well as employee interviews.

Employees who work in specific locations in the building may be exposed to elevated levels of fungi colony forming units (CFU) when compared to other sampled locations in the building.

Air sampling was conducted on October 5, 2021 to assess employee exposure to fungi while working in the building. The sampling was divided into three locations: fresh air/outside, suspect areas, and non-suspect areas. The suspect areas were two rooms where exposure to fungi was of greatest concern. The non-suspect areas were chosen to serve as indoor control samples to compare against the suspect area samples. Finally, the fresh air sample was taken to offer a baseline of fungi species in the fresh air environment. The results indicated that fungi CFUs were elevated in the suspect areas when compared to the non-suspect areas. See addendum for results table.

There are no occupational exposure limits to fungi. However, exposure to fungi can cause respiratory symptoms such as allergies and irritation that can lead to discomfort, and in some cases, illness for people who are sensitive to exposure. The potential hazards employees could be exposed to also depend on the type of organisms encountered in the workplace. The organisms identified in the analysis are ubiquitous to the environment, although they can be opportunistic pathogens.

Since no OSHA standard applies and it is not considered appropriate at this time to invoke Section 5(a)(1) of the Occupational Safety and Health Act of 1970, the general duty clause of the Executive Order, no Notice or Unsafe or Unhealthful Working Conditions will be issued for these hazards. In the interest of workplace safety and health, however, I recommend that you take the following steps voluntarily to eliminate or reduce your employees exposure to the hazards described above.

The following are the recommended elements of a fungi screening and reporting program:

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.
 - b. Identify and, to the extent possible, eliminate sources of dampness, high humidity, and moisture to prevent mold growth.
 - 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).
 - 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).
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.
 - b. Contact the equipment supplier or manufacturer for recommended maintenance schedules and operations and maintenance manuals.
 - 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.
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.
 - b. Water-damaged or contaminated porous materials in the ductwork or other air handling system components should be removed and replaced.
 - c. Ventilation system filters should be checked regularly to ensure that they are seated properly. Filters should be replaced on a routine schedule.
4. Protect building occupants during building renovations or remodeling
 - a. Establish appropriate containment and worker protection program
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.
 - b. Establish a screening program to identify health conditions aggravated by exposure to fungi growth.

Additional information about fungi growth and remediation can be found:

- <https://www.osha.gov/mold>
- <https://www.cdc.gov/mold/>
- <https://www.epa.gov/mold/mold-course-chapter-1>

To evaluate your efforts in reducing these hazards, please send me a letter detailing the actions you have taken, or plan to institute, to address our concerns within 30 days of the date of this document. We will review the response and determine if follow up is needed to evaluate any newly implemented or enhanced engineering controls, administrative controls, policies, procedures, training, or other measures taken to address the hazards identified above.

Under OSHA's current investigation procedures, we may visit your work site within six months to examine the conditions noted above.

We appreciate your attention to these areas of concern. If you have any questions, please feel free to call our office at (314) 425-4259.

Sincerely,

David A. Keim

William McDonald, CSP
Area Director
FOR

Addendum

Air Sampling Results (provided in colony forming units per cubic meter CFU/m³)

Fungi Species	Fresh Air	Suspect Areas		Non Suspect Areas		
	Outdoors-Urgent Care Rooftop 1 st floor	HematologyLab Room 2C-048	ChemistryLab Room2C-046	Blood Bank Room 2A-037A	X-Ray Room 3B-033	Blood Draw Room 2A-055
Aspergillus niger group	12					
Alternaria	12					
Cladosporium cladosporioides	2733	94	318		12	
Cladosporium cladosporioides-like	777	12	59			
Cladosporium sphaerospermum		12				
Epicoccum	59					
Fusarium	12					
Geotrichum	177	188	212			
Penicillium corylophilum						12
Penicillium corylophilum-like	12					
Penicillium fellutanum			12			
Penicillium funiculosum		24	12			
Penicillium glabrum	12	24				
Penicillium glabrum-like	12					
Penicillium miczyiskii-like			24			
Penicillium minioluteum	35	12	59			
Penicillium oxalicum	12		12			
Penicillium purpurogenum			47			
Penicillium simplicissimum			12			
Penicillium verruculosum			12			
Rhodotorula	59					
Trichoderma*	24					
Sterile Mycelia	730	565	636			
Yeast	59					
Total	4770	931	1413	<12	12	12

*Total rooftop results are approximate due to overgrowth of fungal spreader (Trichoderma)

**Table blank spaces are interpreted as Non-Detected.