



To: Dr. Sara Ahern, Superintendent  
From: Scott Fulmer, ScD, MTA Health and Safety Representative/Organizer  
Date: September 13, 2024  
Re: Post remediation verification and routine mold testing

The recent email announcements from Principal Michael Wojkowski and Superintendent Sara Ahern to BUES faculty and staff outlined several developments regarding issues concerning MTA members' health and safety. It is very encouraging to see material improvements to the building, as well as the district's commitment to a process of continuous improvement. In particular, the Health and Safety Committee is critically important

The decision described in the emails to not continue to routinely test mold levels is rational but relevant more to the DPH's interest in avoiding an unenforceable political position than to the building occupants' concerns, or even established best practices of mold remediation. The DPH's determination that the correct steps have been taken may be true; the responsible practice for mold remediation includes an assessment of the mold, including a generalized remediation plan by the assessor, then a detailed workplan to meet the assessor's generalized plan proposed, accepted, and executed by an independent remediator. In this case, the post-remediation verification (August 9, 14) determined some spaces had actionable levels of mold. This raises a question of whether the assessor's remediation recommendations were not adequate, or whether the remediation failed to remove the identified mold. The school district should be able to hold the contractors liable for removing the mold.

While there are no enforceable standards for exposure to workplace mold, nevertheless, there are a limited range of suggested thresholds of normal mold levels put forth by professional organizations. The district has done good work to reduce abnormal mold and moisture levels. Ultimately, a healthy building is defined by healthy and productive occupants. Indeed, the MDPH also states that "Mold testing may be appropriate if occupants continue to have symptoms associated with mold after water sources are repaired and moldy building materials and items in the building have been removed or cleaned. Mold testing can sometimes be helpful to identify which materials may be an ongoing source of mold to assist in completing the remediation; or an individual has a diagnosed respiratory fungal infection, and the treating medical provider requests mold testing to help direct medical treatment." In addition, the EPA states that the post-remediation environment "should show no signs of water damage or mold growth." The findings of the August PRVs call to question whether there are "no signs of mold growth".

To help evaluate these concerns, the MTA will be supporting the BTA to deploy a member survey on indoor air quality and mold. We see this as informative to the work of the health and safety committee and have used it in other districts to guide health and safety committees in the state. We also are looking to conduct our own mold tests to generate information necessary for the BTA's duty to collectively bargain conditions of employment.

Please reconsider your decision to not allow routine mold testing to ensure a healthy environment and assure our members.