

Dragon, Karen E. (CDC/NIOSH/EID)

From: Diane.Etnier@sbcglobal.net
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To: NIOSH Docket Office (CDC)
Subject: 238 - NIOSH Indoor Environmental Quality (IEQ) Alert Comments

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Comments

As a retired teacher and advocate for good IEQ in schools, I looked at this document from the perspective of a school employee. School occupants include students, yet they are only mentioned once on page 10, line 31 "workers and other occupants (including children)".

Also missing is any mention of the role of parents/guardians in school.

They should be:

- warned of any dangers of exposure to dampness in schools that their children attend (page 2, lines 17-21; page 16, lines 12-20)**
- involved in reporting building conditions and their children's health issues to school authorities (page 2, lines 17-21 and 36- 46; page 3, lines 1-6; page 14, lines 8-10 and 39-41; page 16, lines 12-20)**
- involved in health and safety committees or IEQ team (page 2, lines 31-34 and page 16, lines 22-23)**

APPENDIX A: BUILDING INSPECTION CHECKLIST as written is not a useful tool for a building inspection. By looking at a completed checklist I should be able to easily tell where there is a problem with the building - i.e.

Yes should be Good and No should be Bad. In the Ground Level, Drain Pans and Coils and General sections the yeses are all good. In the Roofing section, if I check all yeses then I have water pooling, nests and droppings near air intakes and exhaust air being sucked in by air intakes.

The only good thing in All Rooms, Attics and Plenums is the 1st bullet, yet someone could easily check yes for all 7 bulleted items. Please reword the entire list so that checking NO means there is a problem.

Other comments/suggestions:

Be consistent in using workers and/or occupants throughout the document and not just worker (page 5, line 16; page 10, line 43; page 14, line 39)

Page 1, line 40 mentions checking basements for evidence of dampness. In schools I have found that crawl spaces and slab construction with missing or failed vapor barriers can also be a major source of moisture incursion.

Page 2, line 5 - many older schools do not have AC or dehumidifiers to prevent high indoor air humidity

Page 3, lines 5-6 - if there is no IEQ program at the workplace, then work to get one established

Page 5, line 15 - add commissioning after design and construction

page 10, line 41 - after remediated add (cleaned and repaired or replaced) like you did on page 2, lines 10-11

Page 11, lines 24-38 should mention the proper sequencing of construction activities to prevent contamination of building materials

Page 16, line 22 - after committee add should be established and