

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

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Background

Page 4

Line 25 delete “fungal toxins (mycotoxins).”

By convention, the term mycotoxins is used for low molecular weight fungal toxins in crops that result in human and animal disease.

Replace with “fungal metabolites including triple helical glucan.”

Line 33 delete “can be highly”

Replace with “are”

Line 46

“mold”.

The term mold is not a scientific term. This needs to be defined. I suggest

“The term “mold” is a colloquial term for a group of filamentous fungi that are common on food or wet materials. This includes the green *Penicillium* species that produces penicillin, originally isolated from a melon and fungi that spoil our bread, fruit, cheese and crops. Most of these are Ascomycetes that make a lot of spores that are easily spread. The molds that grow on damp building materials are found in the soil and are adapted to grow on a wide variety of materials. Outdoors, molds live in the soil, on plants, and on dead or decaying matter. There are thousands of species of mold and they can be any color. Different mold species are adapted to different moisture conditions from very wet to just damp.”

Page 5

Line 1 delete “certain” [the 1983 NAS report “Indoor Allergens: Assessing and Controlling Adverse Health Effects (1993)” notes, correctly, that all molds produce allergens.]

Page 10

Line 7

Additional recommendations need to be updated to include

Krieger J, Jacobs DE, Ashley PJ, Baeder A, Chew GL, Dearborn D, Hynes HP, Miller JD, Morley R, Rabito F, Zeldin DC (2010) Housing interventions and control of asthma-related

indoor biologic agents: a review of the evidence. J Public Health Man & Practice 16:
s11-S20.

Information from the EPA supported ASHRAE guideline Indoor Air Quality Guide: Best Practices for Design, Construction, and Commissioning needs to be cited and the advice part, much more information should be adapted from that document to tighten up the language in the draft. There are several sections that relate to mold and dampness including some important issues not raised.