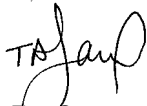


Management Instruction

Mold Prevention, Assessment, and Remediation

This management instruction (MI) establishes policy and procedures on how to address mold-related problems within Postal Service facilities. Mold-related problems may include indoor air quality issues, which could arise as a consequence of mold in the form of live or dead spores or the mycotoxins that some molds emit. Promptly identifying the mold problem and locating the appropriate staff is essential to resolving mold-related issues within the Postal Service.

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Background

Postal Service employees work in approximately 39,000 facilities, 80 percent of which are leased. The general public, including Postal Service employees, are becoming increasingly aware of mold-related health concerns, and the Postal Service is committed to fully addressing any mold-related problems that may develop in Postal Service facilities.

Policy

Postal Service policy is to provide a safe and healthful work environment to employees, customers, and other building occupants. While there are no federal regulations applicable to mold assessment and remediation, the Postal Service is committed to the prevention and correction of water intrusion and moisture problems, and reduction of the impact of mold within Postal Service facilities.

Scope

This MI applies to all Postal Service facilities, employees, contractors, and vendors.

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Regulatory Requirements

There are no federal regulations governing mold assessment and remediation. Facilities Headquarters/Safety and Environmental Performance Management (SEPM) has published *Mold Assessment and Remediation Guidance, 2006* (referred to as "Guidance" in this MI), which includes useful references in its appendices and attachments as described in the following table.

These documents...	provide information about ...
<ul style="list-style-type: none"> ■ Appendix B1, <i>Investigative Statements of Work</i> ■ Attachment 1, <i>Indoor Air Quality and Mold Observation Report</i> 	using statements of work and assessment forms to report on mold assessment and corrective measures.
<ul style="list-style-type: none"> ■ Appendix D1, <i>National Work Practices, Mold Prevention-Related Work Practices Guidance</i> 	following steps to prevent and correct moisture and water intrusion, root causes of mold.
<ul style="list-style-type: none"> ■ Appendix C, <i>eRECS Lease Clauses</i> ■ Attachment 3, <i>Indoor Air Quality and Mold Site Observation Report for Proposed USPS Leases/Acquisitions</i> ■ Attachment 4, <i>Sample Lessor Notification Letter</i> 	helping the Facilities real estate office act on and resolve mold problems at leased facilities.
<ul style="list-style-type: none"> ■ Appendix B2, <i>AIHA Assessment, Remediation, and Post-Remediation Verification of Mold in Buildings</i> ■ Attachment 2, <i>List of Facilities Single Source Provider Program Response Line Phone Numbers</i> 	identifying remediation specifications and finding a telephone number if you need to contact Facilities about a mold problem.

The Guidance is accessible on the Postal Service Intranet. From <http://blue.usps.gov>, click on *Inside USPS*, then *Facilities*, and then *Mold Assessment Guide*.

Mold Assessment, Prevention, and Remediation

The district safety staff, under the guidance of SEPM, initiates the assessment of mold-related problems. The district safety staff gets help and expertise from others, such as Facilities, management, or technical personnel, including consultants or contractors, to resolve the mold concern. The district safety staff must coordinate post-remediation efforts. The level of coordination and consultation will vary each time a mold-related problem occurs, but assembling the right team is critical to resolving a mold-related problem.

Assessment

Assessment of mold-related problems begins by finding the person or group within the Postal Service who can resolve the problem.

At the facility level, the installation head must report a mold-related problem. If the installation head finds a mold-related problem, he or she must immediately contact the district safety office to find out how to handle the issue. Note that the district safety office determines the level of effort required to investigate the problem. As mentioned in the Roles and Responsibilities table under District Safety Specialist (see page 11), investigation could be through phone calls, electronic correspondence, or a site visit by a safety staff member or a consultant. If the matter cannot be solved locally, the installation head is responsible for reporting the matter to the Facilities Single Source Provider (FSSP) program response line, a 24-hour-a-day, 7-day-a-week attended phone line.

In almost all cases, sampling for mold is unwarranted. There are no official mold-sampling guidelines or standards issued by a national health agency. Couple the lack of mold-sampling protocols with the huge span of individual susceptibilities to different mold strains, and one can see the complexity of interpreting sampling results. Because samples can be unreliable, any corrective measures based on a sample may be wrong.

It is more important to promptly and fully correct the root cause of mold problems, including water or moisture intrusion, than it is to sample for mold. When deciding whether or not to sample for mold, the installation head must consult the district safety office and other resources as the safety office determines (e.g., medical, Facilities, legal, or outside consultant). Sampling must be done by, or under the supervision of, a certified industrial hygienist (CIH) hired through consulting services as an independent third party. See the Guidance for sampling methods. As explained in the Guidance, some efforts will not require the help of a CIH, but the district safety office will work with appropriate staff to determine how much CIH help is needed.

The Guidance also provides Investigative Statements of Work (appendix B1) and the Indoor Air Quality and Mold Observation Report form (attachment 1), which may be useful to Facilities and the district safety and environmental offices.

Prevention

To prevent mold growth, the installation head must ensure that the following items are inspected regularly:

1. Heating, ventilation, and air-conditioning (HVAC) systems.
2. Sumps and drip pans.
3. Interior and exterior building components, including roofing, drains, and gutters.
4. Plumbing systems.
5. Caulking and waterproofing materials.
6. Landscaping or soils that drain toward a facility.

If the installation head discovers a problem that can't be corrected locally, he or she must report it to the FSSP response line.

Maintenance staff must assist the installation head if he or she needs help assessing a water or moisture-damaged building component. The Guidance lists resources, including the National Work Practices (appendix D1), which explain how to prevent water or moisture intrusion and how to dry out building materials.

Remediation and Post-Remediation

Remediation includes the following:

1. Stopping moisture or water intrusion.
2. Removing and possibly cleaning all porous materials that have visible mold. Generally it is best to remove and discard porous materials, but certain wood and concrete components might be salvageable with cleaning.
3. Cleaning non-porous materials that have visible mold.
4. Thoroughly drying out all materials.

Post-remediation, coordinated through the district safety office, will include at least visual inspection and possibly sampling to assure the surface is free of mold.

Mold in Leased Facilities

Handle mold-related problems at leased facilities using the same procedures as owned facilities, as detailed in other sections of this MI. Also take the following additional steps for leased facilities when the mold problem cannot be resolved locally and has been reported to the FSSP response line:

1. The real estate office at the facilities service office (FSO) must interpret the lease to determine which party, landlord or Postal Service, has responsibility for maintenance.
2. If the landlord has responsibility, the Postal Service real estate office must oversee its work and ensure that all mold-related problems are resolved.
3. If the landlord fails to act promptly, the real estate office, in cooperation with the FSO contracting officer and Law Department, must act to require the landlord to uphold its obligation. If the landlord fails to do so, the Postal Service will take over the project and seek reimbursement from the landlord.
4. In the rare event a leased facility must be vacated, the real estate specialist, coordinating with the district safety office, the District Manager, and the Law Department, must compile the facts to present to the FSO contracting officer, who may decide to terminate the lease.

Training

Mold-awareness training, which includes familiarity with this MI and the Guidance, occurs as follows:

These personnel...	from these offices...	must be trained by...
Safety	area and district	SEPM*
Environmental	area and district	SEPM
Medical	area and district	National Medical Director
Facilities	FSO, D&C, and real estate	Facilities HQ
Maintenance	HQ, area, and district	SEPM
Facility Safety Coordinators	local facilities	SEPM

*Include mold-related sections of the Facility Safety Coordinator (FSC) training. The training is available in hard copy (#19201-45) or electronically (#19601-22).

Recordkeeping

The installation head of any facility that has had a mold-related problem must keep records of the assessment and remediation. Records must also be kept at the district Safety Specialist office and at the FSO if its staff was involved (either with real estate or design and construction). These records must be kept indefinitely.

Roles and Responsibilities

Person or Organization	Responsibilities
<p>Headquarters</p> <p>Director, Safety and Environmental Performance Management (SEPM)</p>	<ul style="list-style-type: none"> ■ Develop, hold, and update mold awareness training for field staff, including area and district safety managers and area environmental program managers and specialists, maintenance employees, and district staff. ■ Consult with Facilities Headquarters on mold guidance changes; update the Guidance as the scientific, medical, and regulatory sectors develop guidance and requirements.
<p>National Medical Director</p>	<ul style="list-style-type: none"> ■ Provide policy and guidance on appropriate levels of medical surveillance based on known or potential mold concerns and other matters related to mold and employee health. ■ Stay informed on evolving scientific findings for mold-related health issues and work with SEPM to adjust policy and guidance accordingly.
<p>Vice President, Facilities</p>	<ul style="list-style-type: none"> ■ Coordinate with SEPM and its field counterparts to ensure collaboration on both prevention and reaction to mold-related problems. ■ Coordinate with FSOs to address mold-related problems.

Person or Organization	Responsibilities
Manager, Maintenance Policies and Programs	<ul style="list-style-type: none"> ■ Provide policy and guidance on maintenance processes and procedures to ensure steps are taken to mitigate or minimize the causes of mold, specifically preventing moisture and water intrusion.
Manager, Human Resources	<ul style="list-style-type: none"> ■ Coordinate with SEPM on employee and union mold-related concerns, on a case-specific, regional, or national level. ■ Stay informed about current mold and related indoor air quality issues to anticipate how they will affect employees and unions.
Headquarters Field Units	
Facilities Service Office (FSO)	<ul style="list-style-type: none"> ■ Follow the Guidance document, specifically through FSSP and other Facilities projects where mold is a possible concern. Compliance includes contracting with external industrial hygiene experts and mold remediation contractors as needed. ■ Promptly address water/moisture intrusion problems to prevent mold occurrence. ■ Ensure that each manager is able to do his or her part to deal with mold-related matters.
Manager, FSO	<ul style="list-style-type: none"> ■ Ensure that staff complies with this MI and the related Guidance. ■ Understand the potential health, facilities, and operations impact of mold-related problems and prevent these problems by ensuring that mold and water or moisture intrusion matters are promptly and efficiently addressed. ■ Designate contracting officers to support mold-related projects.

Person or Organization	Responsibilities
Manager, Design and Construction (D&C), FSO	<ul style="list-style-type: none"> ■ Obtain contracts for remediation of mold problems. ■ Manage oversight of the remediation contractor. ■ Support project management staff as they respond to and resolve mold-related issues and ensure that these matters are addressed promptly and efficiently. ■ Remind project management staff of the importance of water or moisture intrusion prevention, including HVAC design standards for new facilities or repair and alteration work, and ensure that best practices are followed. ■ Ensure that FSSP projects involving mold-related concerns are assigned promptly.
Manager, Real Estate	<ul style="list-style-type: none"> ■ Allocate staff efforts to respond to and resolve mold-related issues at leased facilities. ■ Enforce landlord maintenance issues involving mold. ■ Ensure staff communicates with the landlord, and consults Law Department on how to enforce landlord maintenance issues involving mold. ■ Respond quickly to mold-related concerns, particularly when acting as contracting officer for the lease, as water or moisture intrusion can harm employees and disrupt operations.
Manager, Contracts and Administration	<ul style="list-style-type: none"> ■ Coordinate with D&C to supply mold assessment and remediation contractors. Construction-related remediation will come through job order contracting while assessment and oversight will come through an environmental consulting contract.

Person or Organization	Responsibilities
Manager, Planning and Approval	<ul style="list-style-type: none"> ■ Promptly process funding requests for mold-related or water or moisture intrusion projects and apprise staff of developments.
Facilities Environmental Specialist	<ul style="list-style-type: none"> ■ Perform environmental due diligence on new leased and purchased facilities for mold-related concerns. ■ Assist real estate staff to determine if relocation is required because of mold-related hazards. ■ Consult with D&C and SEPM on mold-related projects.
Other Headquarters Offices	<ul style="list-style-type: none"> ■ Support SEPM, Medical, Facilities, Maintenance, and Human Resources programmatically or case-specifically. Headquarters offices include the Law Department, Engineering, Contracting, Purchasing, Finance, Information Systems, and Asset Management.
Area Offices	
Vice President, Area Operations	<ul style="list-style-type: none"> ■ Ensure that mold-related concerns do not adversely affect employees, customers, or efficient operations.
Area Managers, Safety	<ul style="list-style-type: none"> ■ Coordinate and consult with district staff on mold-related concerns. ■ Elevate mold-related concerns to the Headquarters level, when necessary. ■ Understand the Guidance so they can resolve mold-related concerns when asked for assistance.
Area Medical	<ul style="list-style-type: none"> ■ Coordinate and consult with district staff on mold-related concerns. ■ Elevate mold-related concerns to the Headquarters level, when necessary. ■ Maintain medical personnel skilled in assessing health impacts from mold and related indoor air quality concerns.

Person or Organization	Responsibilities
Area Manager, Environmental Programs or Area Environmental Specialist	<ul style="list-style-type: none"> ■ Support the area and district safety staff under SEPM on mold-related matters. ■ Understand mold-related concerns and maintain the skills to address those concerns, particularly as related to work practices. ■ Use contractors or consultants, in coordination with the area safety office, to address mold concerns.
Area Manager, Maintenance Operations	<ul style="list-style-type: none"> ■ Ensure national maintenance policies and procedures on preventing and correcting the causes of mold are followed.
Area Finance	<ul style="list-style-type: none"> ■ Respond promptly to requests for funding mold-related or water or moisture intrusion projects so funding delays do not exacerbate problems.
Performance Clusters	
District Managers	<ul style="list-style-type: none"> ■ Ensure that all facilities within the performance cluster follow this MI and the related Guidance so that mold-related concerns do not adversely affect employees, customers, or operations.

Person or Organization	Responsibilities
District Safety Specialist	<ul style="list-style-type: none"> ■ Provide installation-level support on known or potential mold-related matters. ■ Follow up on employee reports or complaints of a potential mold issue with a phone call, electronic correspondence, or a visit to the facility to investigate. ■ Coordinate with appropriate personnel to address specific mold-related problems (i.e. — consultants, medical, facilities, and human resources). ■ Assess mold-related matters and track progress on correcting them. ■ Assess district facilities for mold-related concerns during safety inspections. ■ Coordinate post-remediation efforts, such as sampling or visual inspections.
District Medical (Occupational Health Nurse Administrator and Associate Area Medical Director)	<ul style="list-style-type: none"> ■ Assess employee mold exposure in coordination with the district safety office. ■ Recommend and oversee necessary medical interventions. ■ Consult on required microbial testing if asked to base medical recommendations on sampling or mold assessment data.
Manager, Maintenance	<ul style="list-style-type: none"> ■ Implement preventive and reactive measures to correct causes of mold, specifically moisture and water intrusion.
Area Environmental Specialist (Assigned to a District)	<ul style="list-style-type: none"> ■ Support local safety staff on mold-related matters, as requested. ■ Assist staff with using contractors or consultants, as requested by the district safety office.
District Finance	<ul style="list-style-type: none"> ■ Promptly approve funding requests for mold-related or water or moisture intrusion projects so funding delays don't exacerbate problems.

Person or Organization	Responsibilities
Facility Installation Head	<ul style="list-style-type: none"> ■ Respond promptly to known or potential mold-related concerns. ■ Ensure the facility safety coordinator completes the mold-related sections of the FSC training, available in hard copy (#19201-45) or electronically (#19601-22) so he or she can assist with mold-related issues. ■ Prevent and correct water or moisture intrusion so that employees, customers, and operations are not adversely affected. ■ Assume maintenance responsibilities for smaller facilities without dedicated maintenance staff.
Plant Managers	<ul style="list-style-type: none"> ■ Ensure that this MI is followed so mold-related concerns do not affect employees, customers, or operations.

Resources

For more information on mold-related problems, visit the following Web sites:

- www.acgih.org.
- www.acoem.org.
- www.aiha.org.
- www.ashrae.org.
- www.epa.gov.