



Memo

To: Sharon Moffatt, RN, MSN
Commissioner of Health

From: Austin Sumner, MD, MPH
State Epidemiologist – Environmental Health

Date: June 3, 2008

Re: Level III Building Related Issues Ref#47

On May 8, 2008, the Vermont Department of Health was notified about a Level III Building-Related Issue Ref# 47. The building manager reported the issue after he was informed by a Department of Corrections' Probation & Parole manager about an event that occurred at the Bennington office about six months ago. A summary of the comment section from Building Related Issues Ref# 47 follows:

“I have been informed by a Dept Manager that his staff who worked with old files from the main building has come down with sinus infections, pneumonia, and bronchitis after working with the files. Some people were sick for a matter of days and others for a week after the incident.”

The Health Department asked that affected staff contact Dr. Austin Sumner for a health interview. To date, Dr. Sumner has interviewed the building manager, two affected employees who have come forward, and the industrial hygienist who evaluated the site. A brief description of the situation of concern follows.

Building Related Issue

Approximately six months ago, staff of the Department of Corrections' Probation & Parole Office recognized that there was an excess of historic records on site, and made the decision to prepare the files to be archived. These files containing old records were originally housed at the Bennington State Office Building. They were moved to the current site of the Probation & Parole Office.

Before the records could be archived, they required a comprehensive review and purging of confidential records that could not, by law, be archived as public documents. To expedite the purging process, a group of five or six Probation & Parole employees took multiple boxes from the file room to the conference room and began going through them. There are an estimated 30 to 40 boxes, with records dating back 10 to 15 years.

The process of purging the files required many employees to work multiple hours over multiple days. More than one employee reported that tearing out files from records generated dust, and some records had a musty smell. A number of employees reported developing symptoms such as eye, nose and throat irritation. Some employees reported having allergy and asthma exacerbations during the period of purging. Some symptoms were reported to last several days to a week.

Discussion

On May 16, 2008, the Vermont Department of Buildings & General Services (BGS), in consultation with the Vermont Department of Health, sent their industrial hygienist to perform a site evaluation (report attached). During the visit no visible evidence of water damage or microbial growth was identified on the files. Some surfaces had some visible dust. The industrial hygienist reports that, although a visual inspection was done, the tasks that employees have associated with symptoms were not witnessed during the site visit.

Probation & Parole employees are concerned about exposures that may occur while purging the files. The work of purging the files is not a routine task carried out by Probation & Parole staff. The work of purging the files is unlikely to cause an exposure in excess of VOSHA permissible exposure limit for nuisance dust or respirable dust, and there are NO permissible exposure limits established for other indoor air quality concerns such as mold or moisture. However, the employees who worked in the Bennington State Office Building have been seriously challenged over the last two years.

Recommendations

1. Remove files so storage room can be cleaned.
2. HEPA-vacuum the room and wet-wipe all surfaces.
3. Files should be purged in a well-ventilated room or outside.
4. Employees who work with the files should be allowed voluntary use of N95 disposable respirator (dust mask) consistent with 29 CFR 1910.134(c)(2). This is for employee comfort when working in what could be a dusty work environment.
5. Employees who work with the files should be allowed voluntary use of nitrile gloves to prevent paper cuts and hand contact with eyes, nose and mouth.
6. Employees who have documented allergies or asthma should be temporarily accommodated and job duties related to purging files older than five years taken from the Bennington State Office building should be limited.
7. If duties associated with file purging are onerous or labor-intensive, the employer may choose to hire a contractor to purge and archive files.