

U.S. Department of Labor

Occupational Safety and Health Administration
55 North Robinson, Suite 315
Oklahoma City, Oklahoma 73102
Phone: (405) 273-9560
Fax: (405) 273-9572



May 9, 2003

Social Security Administration
200 NE 27th
Moore, OK 73160

Dear Sir or Madam:

On May 08, 2003, the Occupational Safety and Health Administration (OSHA) received a report of alleged hazardous working conditions and/or violations of 29 CFR Part 1960 citable program elements in your workplace at Social Security Administration 200 NE 27th Moore, Ok 73160. The specific nature of the report involves:

1. The air quality in the building office is toxic and there may be mold, mildew and fungus.

If true this may be in violation of Section 5(a)(1) of the Occupational Safety and Health Act and may be corrected by determining if the source of indoor air quality problems may be arising from microbial contamination. Methods of abatement include, but are not limited to the following:

- 1) Eliminate or control all known and potential sources of microbial contaminants by prompt cleanup and repair of all areas where water collection and leakage has occurred including floors, roofs, HVAC cooling coils, drain pans, humidifiers containing reservoirs of stagnant water, air washers, fan coil units, and filters.
- 2) Remove and discard carpeting and other porous organic materials that have been wetted (rotting wood flooring, mildewed drywall, damp insulation in ventilation system, moldy ceiling tiles, HVAC air filters, etc.). Remove materials in such a manner to prevent dispersal of mold spores. If carpeting cannot be removed, thoroughly HEPA vacuum carpeting and use an anti-microbial agent on carpets.
- 3) Clean and disinfect nonporous surfaces where microbial growth has occurred with detergents, chlorine-generating disinfectants, or other biocides. For example, clean visible biological growth from air conditioning unit condensate drip trays, filter wells and interior surfaces of air conditioning units then decontaminate these surfaces with an appropriate fungicide (e.g., bleach). Insure that these cleaners have been removed before air handling units are turned on.

- 4) Decontaminate interior surfaces, walls, curtains, etc. to remove future sources of mold contamination.
- 5) Maintain indoor air relative humidity below 60% (50% where cold surfaces are in contact with room air).
- 6) Adjust intake of outdoor air to avoid contamination from nearby soil, vegetable debris, cooling towers, or sanitary stacks unless air is adequately conditioned.
- 7) Institute preventative maintenance procedures to ensure the roof and the heating and air conditioning system are maintained so as to prevent build up of microbial contamination. If necessary, use biocides in drip trays that accumulate condensate water.
- 8) Personnel affected with hypersensitivity should be thoroughly evaluated and the problem identified and corrected before returning them to the workplace. If, after the remedial action, the illness persists in the workplace, the affected personnel should be considered for permanent reassignment to another area.
- 9) Remove personnel from the building during removal and decontamination procedures. Provide appropriate personal protective equipment to employees that remove contaminated carpeting, filters, etc., and perform decontamination procedures.

Techniques to investigate these possible sources of indoor air quality problems and methods of correction can be found in the OSHA Technical Manual, under "INDOOR AIR QUALITY INVESTIGATIONS" (available on the OSHA Internet Home Page, <http://www.osha.gov>).

OSHA has decided not to conduct an inspection in response to this report. However, since allegations of the violation of standards have been made, you should investigate the alleged violation(s). Department of Labor regulation 29 CFR 1960.28 requires that your inspection be conducted within 3 working days for potentially serious conditions and within 5 working days for other-than-serious hazards. Any necessary correction(s) should be made within 15 working days after completion of the inspection. If correction(s) cannot be made within 15 working days, please provide me with a detailed abatement plan. Your plan should include:

- (1) All steps taken and the dates of such action to achieve compliance during the prescribed abatement period.
- (2) The specific additional abatement time estimated to achieve compliance.
- (3) The reasons such additional time is necessary, including the unavailability of professional or technical personnel or of materials and equipment, or because necessary construction or alteration of facilities cannot be completed by the original abatement date.

- (4) Interim steps being taken to safeguard the employees against the cited violation(s) during the abatement period.

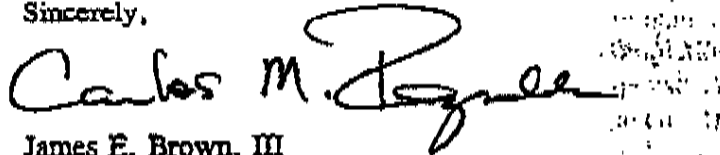
Since the complainant has requested to remain anonymous, please advise me in writing, within 15 working days after completion of inspection, of any action you have taken. Your response should be detailed, and specify what corrective action(s), if any, were taken. If it is determined that, based on the report, no violation(s) exist and an inspection will not be conducted, please notify me in writing within 5 working days of receipt of this letter. We have notified the complainant that the complaint has been forwarded to you for action, and, if the violation(s) are not corrected, to notify us. We will forward a copy of your report to the complainant.

You should enclose any supporting documentation on the action(s) taken, such as monitoring results, new equipment orders, or photograph(s) of corrected condition.

If we do not receive a response from you within 5 working days, indicating that appropriate action has been taken or that no violation(s) exist, an OSHA inspection may be required.

If you have any questions or need assistance concerning this matter, please contact our office.

Sincerely,



James E. Brown, III
Area Director

Enclosure

May 15, 2003

U.S. Department of Labor
Occupational Safety and Health Administration
55 North Robinson, Suite 315
Oklahoma City, Oklahoma 73102

Attention: James E. Brown III

Thank you for the information in your May 9, 2003 letter to me regarding the employee concerns related to indoor air quality (IAQ) at the SSA Moore, Oklahoma Field Office, 200 N.E. 27th Street. I have shared these concerns with our SSA Regional Facilities Management Staff and the SSA Office of Environmental Health and Occupational Safety (OEHOS). In addition, Ms. Kimberly Kroehle, an industrial Hygienist with OEHOS discussed this issue with Mr. Carlos Reynolds of your staff on Thursday May 15, 2003. In that discussion Ms. Kroehle reported that SSA will coordinate a comprehensive IAQ survey at our facility the week of May 19, 2003. Based on this timeline, Mr. Reynolds informed Ms. Kroehle that our due date to issue the report was extended to June 13, 2003.

In response to the concerns raised, a conference call was held between OEHOS, our Regional Office staff and myself on May 14, 2003 to determine if there were any environmental health and safety issues that require immediate attention. Based on this discussion no immediate concerns were identified.

The building that the SSA Moore Office occupies was constructed in 1999. While there have been previous issues related to moisture intrusion through the building slab, the landlord has taken action to correct this problem. The lessor conducted moisture transmission testing of the slab, as well as, bead blasted and sealed the concrete slab.

The comprehensive IAQ survey will be conducted by a representative from the Public Health Service and will include a walkthrough of the facility, a visual inspection and basic indoor air quality measurements. Special attention will be paid to all areas with water damage or previous water damage, including the slab. This will allow for a third party assessment of conditions in the office and a determination if further testing or repairs are necessary. Upon issuance the report will be forwarded to the General Service Administration, which is responsible for the maintenance of the lease for our office. GSA will then coordinate with the landlord if further action is necessary.

this will be done on Tues. - 5/20/03

We expect a report of the findings and an abatement/action plan, if needed, to be generated and released by June 13, 2003. This information will also be shared with our union representative and your office upon receipt.

If you have any questions regarding our plan of action, please contact me on 405-799-4140.

Sincerely,

Dennis Purifoy
District Manager, SSA

Cc:

Steve McDaniels, OSHA

L. Prohs, Region VI, SSA

K. Kroehle, Industrial Hygiene Staff, SSA