

Site Visit Report      Level III Investigation    BRI #47

To:            Dr. Austin Sumner, VDH

From:         Mike Blanchet, Industrial Hygienist  
                  QA Division, BGS

CC:            Gerry Myers, Robin Orr, BGS

Visit Date :   May 14, 2008

Location:     Room W8, DOC (File) Storage Room  
                  @ DOC Office (West half of "Fecteau Modular") Bennington, VT

Reference:    Building Related Issue Notification #47

Purpose of Visit

BRI #47 notification was elevated very quickly to a Level III BRI response and forwarded to VDH 4:57 pm on 5/7/08, the purpose of this visit was to provide onsite industrial hygiene support and assistance to Dr. Sumner in the assessment of workplace conditions associated with BRI Notification #47. After discussing the notification with Dr. Sumner and determining what particular assistance was desired, a visit was scheduled to assess the general condition of the DOC files at the site, and to visually examine the file room, file containers, and the files themselves for any evidence of water damage, visible growth, dust accumulations, dirt or debris, (etc.) and to be prepared to perform bulk samples of such materials if warranted. Any additional observations regarding the work practices involved that were associated with exposures or conditions believed to be associated with the outbreak of illness (which may have actually occurred from 6 mo. to up to a year ago per an employee interview that Dr Sumner had just been able to conduct) was desirable.

Major findings

Files have been kept stored in clean dry cabinets and almost exclusively in new covered boxes in an area that has not been infiltrated with water. There is no evidence that any of the boxes, materials, or even numerous individual file covers that I pulled to be examined have ever been wet or in a condition that might be conducive to supporting microbial growth. There is a normal to light accumulation of dust on the top of exterior surfaces (looks and feels like paper dust) in the storage room, however the closed boxes and file cabinets do not have any evident accumulated dust or debris, and essentially look like they haven't been manipulated since originally loaded into the cabinet or box. I suspect most "working files" would have some obvious debris beginning to accumulate in the cabinet or storage box from manipulation... however these file containers (boxes

overwhelmingly) appear to have had minimal disturbance since the files were placed in them and there is almost no apparent dust, debris, or odors (let alone any distinctive musty or “pukie” type odors) in the storage area or upon opening of the box tops. The remaining files also do not give off any suspect odors when the top of the boxes are opened. Individual files I examined did not appear to have dust or removable particulates on the exterior of the files that could be build up by sweeping my hand over their covers. For these reasons I suggest that the files have not been kept in environments that would encourage microbial growth.

The potential dust exposures during actual file preparation/consolidation activities that had been performed by multiple staff on the conference room table, that have been discontinued, obviously could not be assessed during this visit. Such an assessment of the amount of normal paper dust or other file debris that could be generated during the work activities such as opening of each individual file, the tearing out of materials that need not be included in the records for preservation, and the manipulation of possibly the oldest of the files would of more significance than an assessment of the conditions of the files. I did not replicate this process nor monitor it, so have I have no opinion on what level of risk might be involved. It do feel the files that are being stored are in a clean and well protected state, appear to have had little disturbance since being placed in a very clean box or file cabinet, and short of examining each and every individual file for “water damage”, my random sampling did not reveal any percentage of water damaged or grossly deteriorated files. There is not apparent conditions : obvious growths or contamination, excessively high dust loads, or gross condition of files containers or cabinets that suggests these files are anymore dangerous than other files of a similar age that have been kept dry, and frankly the more important (from any exposure standpoint) issue is what activities might take place to disturb or process the files which might generate dust and debris (which could not be evaluated at this time).

### Visit Discussion

Upon arrival, I was directed to the room W8 by staff who also informed me that they had discontinued the “file preparation activities” (preparing files for Central Record storage by removing unnecessary, extraneous, and voluminous records (“tearing them out”) of the files in order to consolidate files to be shipped for formal record retention). Without an ongoing file prep process to assess (described to be several staff members tearing into the files on the conference table at the site) the actual suspect work activity could not be evaluated for exposure potentials, so a careful review of the files and the file storage area was conducted.

Per discussion with staff regarding the work process, the oldest files had been the first to be worked, and approximately 7 – 13 boxes of consolidated files (on left of picture below) were indicated to be examples of the result of the consolidation process. The view on these next three photos are ...looking thru the door, to the right from center, and to the corner to the inside right of center.



Approximately 56 boxes of files (in total) were stored in the W8 storage room, and I'd estimate that 43 boxes files dated 1993 – 2006 remained to be consolidated (along with the two file cabinets filled with files). Two 4 drawer vertical storage cabinets also contained files [ the filled files are adjacent the empty olive colored file cabinet above], while five 4 drawer and two 5 drawer vertical file cabinets were also stored in the room but were completely empty (and were inspected and found to be visibly clean of any dust, dirt, or debris).

The lone uncovered box (below) with non-uniform files in it is the exception (i.e. was uncovered) but it is probably indicative of the condition of some of the older files (with some bent over tops of different sized files (etc.). Even the bottom of this box however, does not contain much debris, and doesn't appear to be a "working file".



About 10 boxes of unused white office paper crowded the center of this storage room, and a few boxes of partially filled keyboards and computer junk, a VDT, a boxed inkjet printer, and an inactive CPU were also stored in the room.



While several printer cartridges were also stored in the room in closed boxes, no other potentially hazardous materials were stored in the room and no odors of any kind (organic, musty, pukie, etc.) were noticeable in the storage room. The ceiling, walls, and floor of the storage room show no evidence of any water infiltration/intrusion in this room. The exterior of all the ~56 boxes examined in the room also showed no signs of

being wet (water marks etc.) and were generally very clean and good to excellent condition, and only one or two boxes containing files were not covered with a clean box cover. No visible “suspect growths” of anything was noted anywhere in the room, on/in the boxes or cabinets, or on any of the files pulled and examined during the visit. In fact no accumulation of removable dusts was found by wiping my hand across the surfaces of randomly chosen files in the cabinets and boxes (which was repeatedly performed as I removed files to view the interior of the boxes for dirt, dust, or debris)... such that I could not locate sufficient removable dusts on or in files for bulk analysis.



A light dust did coat the top surface (only) of materials stored in the room. The dust appeared to be normal office paper dust and the light dust was approximately the same color and consistency as other dust accumulations found on the top of the break area fridge, and on the inlet grill to the two HEPA filtration units operating in the circular hallway of this DOC office area.



One odd felt-like accumulation of fiber was noted in the bottom of file drawer of file cabinet # 6036. [Before and after pictures follow of the bulk sampling of the fibrous debris that had settled in the interior of the bottom drawer] I have retained the bulk sample (#1) should you desire to have it analyzed however I don't believe it is biological nor is it likely to result in any real employee exposure potential as it was well stuck to the bottom and was not subject to disturbance when files were manipulated. It was an odd "accumulation" as all the other (filled) drawers I'd examined were essentially clean (visually clean of dust and debris and "hand wipe test" free of dust – as were all the

empty files in the room. Even the rest of this lower drawer was quite clean. I scraped some up ~1"x4" of it into a bulk sample bag utilizing my pocket goniometer as a scraping tool (placed in the shot as a reference for scale).





Below is a box of “restitution tickets” that I hand wipe ten different ticket surfaces of with my hand and could not see an accumulation of dusts.



Here's an example of some of the newer files ... some of the colored sheets are actually carbonless copy paper copies primarily from court activities.

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