

Sinks, Tom (ATSDR/OA/OD)

From: Sowell, Anne (ATSDR/DHS/OD)
Sent: Wednesday, August 08, 2007 6:10 PM
To: Bashor, Mark M. (CDC/CCEHIP/NCEH)
Cc: Williamson, G. David (ATSDR/DHS/OD); Dearwent, Steve (ATSDR/DHS/HIBR); Sinks, Tom (ATSDR/OA/OD)
Subject: FW: FEMA trailer consult
Attachments: fema.xls; formaldehyde_report_0507.pdf

Mark,

Lynn Wilder is an industrial hygienist. She read the news clips about the FEMA trailer work and became interested in what ATSDR did. After reading the initial report from ATSDR on FEMA trailers that was done by DTEM she is very concerned about the work that was done and the conclusions of the consult. Her concerns are stated below.

The sampling scheme was designed by FEMA and the data collected by EPA. ATSDR was apparently asked to only comment on the formaldehyde levels observed and specifically asked to not comment on the health effects since this is mentioned several times in the report. However the spin in this report is that the levels observed are safe for all but sensitized individuals and this appears to not be supported by the accepted standards for occupational exposure noted below. If ATSDR was asked not to comment on the health effects, it would still have been possible for the report to include information about the acceptable occupational exposure levels to put the findings into a more appropriate context.

Could we talk about this?

Thanks,

Anne

From: Wilder, Lynn (ATSDR/DHS/HIBR)
Sent: Wednesday, August 08, 2007 5:19 PM
To: Sowell, Anne (ATSDR/DHS/OD)
Cc: Wilder, Lynn (ATSDR/DHS/HIBR)
Subject: FEMA trailer consult

Anne,

I read the daily news clips and the ATSDR formaldehyde evaluation (attached pdf) caught my attention for many reasons. I've tried to outline them:

- 1) Except for the first day, the conditions during air sampling are not reflective—they underestimate—of typical residential exposure. Indoor sampling to evaluate a health hazard is done with the home sealed as much as possible and a furnace turned on to represent worse case conditions.
 - The results show that during the 1st day (24-hr sample w/doors and windows closed had higher maximum (up to 2,035 and 2,280 ppb) and average (1,030 and 1,028 ppb) values than almost all of the rest of the sampling days (when the homes were ventilated).
 - Even the rest of the samples, which were collected with doors and windows open or with the air conditioning set to 72 and bathroom vents open detected levels of concern. The average of all of the daily average values was 393 ppb; the average of all daily maximum values was 1,007 ppb.
- 2) Even with the doors and windows open, formaldehyde levels exceed:
 - all three ATSDR MRLs: acute (1-14 days)= 40 ppb; intermediate (14-365 days)=30 ppb; and chronic (>365 days)=8 ppb;

- the ACGIH occupational short-term (15 min) exposure guideline of 300 ppb;
- the NIOSH 15-minute ceiling value of 100 ppb;
- the OSHA 8-hour average of 750 ppb and their short-term exposure level of 2000 ppb; and
- the AIHA ERPG of 1200 ppb

3) I am extremely concerned that we have compared the air sampling results with an occupational exposure level of 300 ppb (ACGIH)—residents are exposed for up to 24 hours/day and may reside in these homes for years. This exposure should not be compared to a 15-minute occupational value.

I have also attached a quick and dirty excel spreadsheet that converts the ug/m³ data in the health consult into ppb for your info.

I would be happy to assist in any possible follow-up that may be required.

Thanks
Lynn

Lynn Wilder, MSHyg, CIH
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