



MEMORANDUM

TO: ECU Campus Community

FROM: Phil Lewis, CSP
Director of Environmental Health and Safety

DATE: April 27, 2023

SUBJ: Environmental Health & Safety (EH&S) Update to Campus: Brewster A-Wing

We have received the National Institute for Occupational Safety and Health (NIOSH) Health Hazard Evaluation Report for Brewster A-Wing. The report is available for review at <https://oehs.ecu.edu/2021/12/brewster-a-wing-updates/>. The Health Hazard Evaluation was requested in response to employee concerns that cancer diagnosis could be related to indoor environmental quality (IEQ) and environmental exposures in the building. NIOSH was established as an independent research program to create objective scientific research findings in the field of occupational safety and health and is the national leader in occupational safety and health research, standards, and services.

Following an in-depth environmental evaluation and assessment, NIOSH investigators “found no evidence that the cancers reported by ECU employees working in the Brewster A-wing are associated with a common workplace exposure. No significant hazardous exposures were identified, and employees are unlikely to have any exposure or concerning levels of exposure to cancer-causing substances in the workplace. The distribution of cancer types reported by ECU employees is not unusual and there does not appear to be an excess of cancer.” NIOSH does not believe further case finding or investigation would lead to the identification of a cluster or unusual pattern of cancer among employees (see pages 15-16 of report).

NIOSH recommendations were also offered as part of the evaluation report and are provided below with corresponding response (see pages 16-18 of report):

1. Inform employees about this evaluation and share this letter with employees. CDC posts general information about occupational cancer at [Occupational Cancer | NIOSH | CDC](#), and information about cancer cluster evaluations at [Guidelines for Examining Unusual Patterns of Cancer and Environmental Concerns | NCEH | CDC](#).

Response: The NIOSH report will be disseminated to the campus community and posted on the EH&S website at <https://oehs.ecu.edu/2021/12/brewster-a-wing-updates/>.

2. Improve communication between managers and employees regarding responses to employee health and safety concerns. A supervisor or manager who is sensitive to the employees’

concerns should communicate directly with those who report health and safety concerns. Points to consider include:

- a. Actively listening to employees' concerns in a nonjudgmental manner. Employees should feel that their concerns are taken seriously.
- b. Regularly informing employees of exactly what steps are being taken to assess the problem, what has been determined, and what remains to be determined. A combination of written reports and face-to-face meetings are valuable.
- c. Routinely share information with employees rather than waiting until a cause of the problem is discovered; this will reduce the chance of distorted rumors.

Response: Information regarding communication of health and safety concerns between managers and employees will be distributed through the EH&S Building Administrator and Safety Representative network.

3. Encourage employees to learn more about known cancer risk factors and measures to reduce risk for preventable cancers. Even though cancers among employees are not likely due to their work, employees may still have concerns about their own risk for cancer.
 - a. Modifiable personal risk factors that are associated with certain types of cancer include tobacco use, high alcohol consumption, a diet low in fruits and vegetables, physical inactivity, and obesity.
 - b. Employees should discuss available cancer screening programs according to age, sex, or family history with their primary care provider. For some types of cancer, these programs can lead to earlier detection and earlier treatment, which may increase the chances of curing the disease.
 - c. The American Cancer Society has information about cancer risk factors ([What Causes Cancer? | American Cancer Society](#)), as well as additional information that may help address some employee concerns regarding cancer clusters ([Cancer Clusters](#)).

Response: Employees are encouraged to discuss cancer risk factors and measures to reduce risk of preventable cancers with their primary care provider. Employees are also encouraged to seek cancer risk factor information from available community resources including the American Cancer Society. EH&S will work to have this information included in the campus well-being initiative.

4. Encourage employees to seek assessment and treatment from a qualified health professional if they are experiencing work-related symptoms. Occupational medicine physicians can be found through a variety of sources, including the Association of Occupational and Environmental Clinics (<http://www.aoec.org/>) and the American College of Occupational and Environmental Medicine (<http://www.ocoem.org/>). It may be useful to provide the physician with a copy of this report.

Response: Work-related injuries and illnesses are managed through the University's Workers' Compensation program administered by EH&S. Employees must report work-related injuries and illnesses immediately to their supervisor and EH&S. EH&S will coordinate appropriate medical care for compensable work-related incidents.

5. Consider providing employees with assistance in modifying personal risk factors for cancer. Options include tobacco cessation programs [NIOSH 2015], nutritional counselling, and exercise programs. Information about the NIOSH Total Worker Health Program can be found here: <https://www.cdc.gov/niosh/twh/>.

Response: Employees are encouraged to participate in employee wellness programs offered by the University and surrounding community. Additional information regarding employee wellness programs is available at <https://crw.ecu.edu/wellness-fitness/employee-wellness/>.

6. Implement a formal (preferably anonymous) system for reporting building concerns to the facilities maintenance manager or a building administrator. This system can be paper or electronic and should include a feedback mechanism to let staff know when and how the problem is fixed.

Response: Employees are encouraged to communicate building concerns to their supervisor and submit work requests using the [Facilities Services work request system](#). Employees may also submit requests for indoor environmental quality assessments to EH&S at safety@ecu.edu.

7. Continue to improve your IEQ management program. If you would like more information on IEQ, including the documents “Building Air Quality–A Guide for Building Owners and Facility Managers” and “Building Air Quality Action Plan” see the [NIOSH Topic Page on Indoor Environmental Quality](#). The basic elements of a good IEQ plan include the following:
 - a. Properly operating and maintaining the ventilation equipment.
 - b. Overseeing the activities of occupants and contractors that affect IEQ (e.g., housekeeping, pest control, maintenance).
 - c. Ensuring effective and timely communication with building occupants regarding IEQ.
 - d. Educating employees about their responsibilities in relation to IEQ.
 - e. Proactively identifying and managing projects and renovations that may affect IEQ.

Response: EH&S has an established indoor air quality program that adheres to regulatory requirement and industry best practices. Additional information regarding the University’s indoor air quality program is available at <https://oehs.ecu.edu/industrial-hygiene/indoor-air-quality/>.

8. We do not recommend additional air sampling for VOCs, mold, or other potential indoor contaminants to address IEQ complaints. These results are unlikely to alter recommendations, such as improving the HVAC systems in the building. In addition, no standardized evaluation criteria exist to assist in the interpretation of the data. Finally, the cost of these tests (both in sample collection and analysis) can be high.

Response: The need to conduct air sampling will be determined on a case-by-case basis when conducting future indoor environmental assessments.

9. Consult with a qualified ventilation contractor to ensure that existing HVAC systems are functioning as designed, are appropriate for the work, and that all occupied spaces are receiving an adequate amount of outdoor air, keeping in mind available guidelines.
 - a. We recommend a test and balance be performed every five to seven years to ensure HVAC systems continue to operate as designed.
 - b. We also recommend a test and balance be performed when significant changes occur in the areas these systems serve (e.g.: number of occupants, type/amount of equipment used, nature of work performed, overall size of the space).

Response: Facilities Services recently upgraded the building automation system for Brewster A-wing. System modifications enable Facilities Services to monitor HVAC system operation status and change operating parameters remotely. These system upgrades will provide improved indoor air quality for building occupants and reduce energy consumption. EH&S will coordinate with Facilities Services to formalize a HVAC evaluation program and schedule for this building.

10. Update your fragrance-free workplace policy. Ensure the policy addresses perfumes and other scented personal care products, air fresheners, and potpourri.
 - a. The American Lung Association publishes a sample fragrance-free school policy: <http://action.lung.org/site/DocServer/fragrance-free-policy-sample-updated.pdf>.

Response: Perfumes and other scented products are discouraged especially in areas where employees have multiple chemical sensitivities. Employees are encouraged to be sensitive to the fact that many people have adverse reactions to these products. EH&S will collaborate with Human Resources to update policy.

Receipt of the NIOSH final report concludes the health hazard evaluation for Brewster A-wing. Although findings did not indicate any building-related environmental risks, EH&S staff will continue to monitor indoor environmental quality and post any updates on our website. EH&S has taken the proactive measure of developing a response and communication protocol for suspected disease clusters that includes consultation with faculty public health experts and local and state health representatives.

EH&S acknowledges the contributions of the University Environment Committee and ECU faculty in the field of Public Health throughout this health hazard evaluation process. We will continue to value and utilize their expertise as we respond to occupational safety and health concerns on campus. Protecting the health, safety, and well-being of our campus community remains a top priority of East Carolina University.

If you have any questions or concerns, please do not hesitate to contact EH&S at 328-6166 or safety@ecu.edu.

Attachment: NIOSH Health Hazard Evaluation Report for Brewster A-Wing