

Alert | Environmental



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Hurricanes Harvey & Irma: Controlling Water, Mold, Bacterial Fallout

Six Tips on Managing Water Damage, Mold Growth, and Bacterial Threats

As Florida, Georgia, South Carolina, Texas, and other impacted areas begin the journey to recovery after Hurricanes [Harvey](#) and Irma, property owners are faced with the challenge of addressing water damage, preventing or remediating mold growth, and heading off bacterial threats from potentially contaminated flood waters. When water damage, flooding, or moisture intrusion occurs, there are several important factors to consider, on a case-by-case basis, when addressing potential or actual mold, microbial, and bacterial impacts.

1. Prompt Action is Essential

- Take quick action – it's the key to preventing water intrusion from becoming a significant mold or bacterial problem.
- Stop any ongoing source of water intrusion, evaluate the source and extent of water damage, mold-impacted building materials, and bacterial threats, and prepare an appropriate plan of action for remediation.
- Analyze insurance policies early in the process and promptly notify carriers of any water damage, mold growth, and bacterial threats. Many insurance policies require prior approval of selected consultants and contractors, as well as remedial scopes of work developed for the impacted property, so putting carriers on notice and requesting related approvals is critical.

- Determine whether there are notice obligations under existing loan agreements, management, partnership, joint-venture agreements, and leases with tenants.

2. Retain Qualified Professionals

- Retain a qualified environmental consultant with a licensed Certified Industrial Hygienist (CIH) on staff. A CIH can help best determine the source and extent of water damage and the appropriate scope of work to prevent or remediate mold and bacterial growth.
- Hiring only a remediation contractor may not be enough. A prudent approach in many cases is to engage a CIH to conduct an assessment of water/moisture and mold/bacteria-impacted building materials, develop the appropriate scope or work for remediation, and assist in the selection of a qualified remediation contractor to perform such scope of work.
- As part of its duties, the CIH should monitor the remediation contractor's performance of the scope of work, and confirm that all water damage and related mold and bacterial growth have been appropriately remediated in accordance with prevailing industry standards. In this way, the CIH provides an important double-check on the quality of the remediation.

3. Consider Carefully Whether Indoor Air Sampling is Necessary or Appropriate

- A thorough visual assessment with moisture metering and/or infrared camera conducted by a qualified CIH is often the most effective way to confirm whether mold and/or conditions conducive to mold are present, and ultimately whether mold has been remediated successfully.
- Sampling methods for mold are not standardized and often yield highly variable results. Indoor air sampling often leads to results that are difficult to interpret, or that indicate a problem when there is none.
- There are no regulatory standards against which to compare air sampling results for health or environmental assessments. Mold spores are ubiquitous and grow almost anywhere moisture is present. In many cases, the objective should be to demonstrate that there is a lower concentration of mold spores in indoor air than in outdoor air.
- Before any air sampling is conducted, a plan should be carefully developed that includes a clear purpose, sampling strategy, and protocol for interpreting results.
- Before any post-mold remediation indoor air confirmation sampling is conducted, a CIH should confirm via a thorough visual assessment and moisture metering that all water damaged and/or mold-impacted building materials have been remediated in accordance with the site-specific scope of work and prevailing industry standards, and that no excessive moisture or visible mold growth remains.

4. Document Assessment Findings, Remediation, and Results of Confirmation Sampling

- It is important to document that the assessment and remediation work conducted was thorough, and that all impacts resulting from water intrusion have been successfully remediated. Maintaining such documentation will help avoid future obstacles in financing, leasing and sale transactions.

- The CIH should prepare an assessment report that documents its initial assessment findings and recommendations for remediation. Once the remediation has been completed by a qualified contractor, the CIH should prepare a second, final report documenting that the conditions identified in its assessment report were remediated in accordance with its recommendations, that no mold or bacterial growth, or conditions conducive to mold or bacterial growth, remain, and that no further investigation or remediation is necessary.
- The results of any post-remediation bacterial or indoor air sampling (if conducted) should be included in the final report, along with an interpretation of such sampling results by the CIH.

5. Communicate with Building Occupants

- Maintain open lines of communications with building occupants, and provide information regarding the remedial measures being taken and a timetable for completion.
- Avoid the reluctance to provide bad news. Sharing information with building occupants and users in many cases actually reduces the potential for and significance of third-party claims.

6. Don't Cut Corners

- Avoid the temptation to simply clean porous building materials such as drywall, insulation and carpeting. While some porous materials can be salvaged if dried completely within 48 hours, the more prudent approach is to remove and replace porous materials and limit cleaning to non-porous materials. While this approach may increase demolition and replacement costs, it more effectively reduces the risk of future mold and bacterial growth and related remediation costs and third-party claims.
- Porous materials that are wet for more than 48 hours should be treated as though mold growth and/or bacteria are present, and removed and disposed of accordingly.
- Evaluate incidental regulatory requirements, such as whether proper abatement of asbestos containing materials or lead paint is required in connection with the remediation project, and have any such work conducted by qualified professionals.
- Clean and maintain HVAC systems, replace air filters, drip pans, etc., during remediation.

Additional information helpful in responding to water damage, mold and bacterial growth is available from the [U.S. Environmental Protection Agency](#).

Author

This GT Alert was prepared by **Kerri L. Barsh**. Questions about this information can be directed to:

- [Kerri L. Barsh](#) | +1 305.579.0772 | barshk@gtlaw.com
- Or your [Greenberg Traurig attorney](#)

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