



ENTEK CONSULTING GROUP, INC.

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June 15, 2007

Ms. Donna O'Brien
Claims Representative
State Compensation Insurance Fund
P.O. Box 659011
2450 Venture Oaks Way, Suite 500
Sacramento, CA 95833-3291

Re: State Board of Equalization Mold Evaluation on 18th, 21st, 22nd, and 23rd Floors; 450 N Street,
Sacramento, CA

Dear Ms. O'Brien:

This report presents results of the mold investigation by Entek Consulting Group, Inc. (Entek) at the State of California Board of Equalization (BOE) located at 450 N Street in Sacramento, CA. You requested our services to collect air samples on the 21st, 22nd and 23rd floors of the building following complaints by staff on these two floors.

The onsite inspection by Entek was conducted on May 17 and June 11, 2007. As requested by you, the role of Entek was to assist in evaluating the extent of mold spore levels only on these floors of the building. There has been a history of water leaks on the 22nd floor from the balcony area located at the south side of the 23rd floor directly above. Prior to our onsite visit, repairs have started at the south balcony area of the 23rd floor to prevent further leakage into the building, although the project was not completed at the time of our investigation.

On April 26, 2007, I met with Ms. Charlene Yount, Chief of BOE, Ms. Peggy Davis, Health and Safety Officer with BOE, Ms. Judy Knight, Return to Work Coordinator with BOE, Mr. Michael Davis, Building Manager with DGS, and Mr. Vincent Paul, Staff Services Manager with DGS to discuss the concerns and history of the building with regards to the previous water intrusion, testing by DGS, and the plans for testing by Entek.

On May 17, 2007, environmental sampling was conducted on this project which included collection and analysis of 17 air samples for total non-culturable mold spores, 17 air samples for culturable mold spores onto malt extract agar, seven dust samples from the carpet evaluated for mold spores, and four vacuum bulk samples collected from carpeted surfaces for evaluation of particle identification by direct microscopic examination. Included in the total number of air samples indicated above, there were three air samples collected for non-culturable mold spores and three air samples for culturable mold spores collected outside the building for comparison to the interior samples. The following is a discussion of each sampling technique and the results of the findings. Air sampling was conducted using both methods collected side by side in each of the sample locations.

In addition to the sampling by Entek, Mr. Jeff Neeland, Associated Industrial Hygienist with DGS also conducted non-culturable mold sampling using similar Air-O-Cell sampling cassettes in the same location as our samples. Ms. Judy Knight also was present for the duration of the sampling period on May 17th.

On June 11, 2007, I returned for additional visual inspections of the 22nd floor, 23rd floor and 21st floor. I also collected on this date settled dust for particle identification by polarized light microscopy (PLM) with analysis by Forensic Analytical Specialties, Inc. of Hayward, CA. Mr. Jeff Neeland, and Ms. Judy Knight accompanied me during this second site visit.



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Air Sampling Results

Culturable Mold Spore Results

Culturable fungal spore sampling consisted of collecting air samples onto agar plates using an Anderson N6 single-stage microbial sampler, in conjunction with a high volume pump at a flow rate of one cubic foot per minute (1 CFM). The air flow was calibrated using a Bios DryCal DC-Lite Calibrator, a primary standard, after sterilizing the sampler with isopropyl alcohol. There were 17 air samples collected by this method and included 14 inside of the building and three outside of the building. All air samples were collected for a period of five minutes using a stop watch to time the sample periods.

The air samples were collected onto standard petri dishes with malt extract agar (MEA) for general mold spore growth. The petri dishes were placed inside of the Anderson sampler.

Air samples were collected for five minutes for both the indoor and outdoor samples for a total of approximately 141.5 liters for each sample. As the air passes through the 400 micro-precision holes in the Anderson N6 sampler, the air is impacted onto the collection media. The samples were assigned a unique sample number, and sent to Environmental Microbiology Laboratory (EML) in San Bruno, CA, where they were incubated for a period of time prior to the staff analyst evaluating the samples.

There were four air samples collected on the 22nd floor, two air samples collected on the 23rd floor, three air samples collected on the 21st floor, three air samples on the 18th floor (as a control test area of non-complaint), and two air samples collected in the attic space above the drop-in ceiling system on the 22nd floor. Air samples were collected outside of the building at the north side of the building near the side walk and were collected first at approximately 9:00 am and again two more samples in the afternoon between 12:30 pm and 12:50 pm.

The total concentration of culturable mold spores inside the building ranged between < 7 colony forming units per cubic meter (CFU's/M³) and 296 CFU's/M³, averaging 52 CFU's/M³ for all air samples inside of the building. The average mold spore levels for each floor tested are as follows: 18th Floor 138 CFU's/M³, 21st Floor 21 CFU's/M³, 22nd Floor 33 CFU's/M³, 23rd Floor 28 CFU's/M³, Attic Space of 22nd Floor 28 CFU's/M³.

For comparison, and to put these results into perspective, the total concentration of mold spores in the three outside ambient air samples were 706 CFU's/M³, 1,003 CFU's/M³ and 1,058 CFU's/M³, averaging 992 CFU's/M³.

The primary mold genera found in the outside air samples was *Cladosporium* followed by a much less extent *Penicillium*. Inside of the building, there were very low levels of culturable mold colonies with *Cladosporium* also as the predominant genera detected at concentrations much lower than that detected indoors.

Non-Culturable Mold Spores

Air sampling was conducted to evaluate non-culturable mold spores in the building and was accomplished by collecting air samples onto "Air-O-Cell" sampling cassettes. The air sample is collected onto a coated plastic strip and visually evaluated by the analyst for all spores which stick to the coated slide. Since this technique includes evaluation for both non-culturable and culturable spores, the results will generally be higher than the sampling technique for culturable mold spores using the Anderson N6 impaction sampler, which relies on growth of spores onto a media.



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There were 17 air samples collected and analyzed for non-culturable mold spores on this investigation, which included 14 air samples inside the building, and three air samples outside the building at the north side of the building by the sidewalk area for comparison to the air samples collected inside. Air samples were collected in the same locations as for the culturable mold spores. All of the sample times are noted on the chain of custody form for each location.

The samples were assigned a unique sample number, and sent to EML in San Bruno, CA, where they were evaluated by an analyst. The total concentration of mold spores inside the building ranged between 27 spores/M³ and 734 spores/M³, averaging 110 spores/M³. The average spore concentration on each of the different locations tested are as follows: 18th Floor 288 spores/M³, 21st Floor 53 spores/M³, 22nd Floor 69 spores/M³, 23rd Floor 67 spores/M³, and in the attic space of the 22nd Floor 53 spores/M³. For comparison to the interior samples, the three outside air sample concentration of total mold spores were 701 spores/M³, 1,227 spores/M³, and 2,356 spores/M³, averaging 1,428 spores/M³.

As with culturable mold spores, it is also important to evaluate the distribution of mold spores seen inside a building compared to the outside air. If there is a significant increase in one or more individual spore types seen inside a building compared to the outside flora, it may be indicative of a mold source inside the building.

The primary mold genera found in the outside air samples was *Cladosporium* followed by *Penicillium/Aspergillus* type spores, Basidiospores (comprised primarily of mushroom type spores), and Ascospores. Inside of the building, *Cladosporium* was also found to be the predominant genera detected at concentrations much lower than that detected indoors.

MoldRANGE™ Extended Outdoor Comparison Report and MoldSTAT™ Supplementary Statistical Spore Trap Reports

Attached to each set of laboratory reports is additional information provided by EML regarding mold spore concentrations typically found outdoors during the month sampled for comparison to the results from our testing. The MoldRANGE™ Extended Outdoor Comparison report provides a review of a large data base of air samples collated by EML for locations across the United States for comparison to air sampling on any given day. This large data base of MoldRANGE™ provided a secondary comparison to the air samples collected by Entek for greater assurance of the types of mold spores expected and actually detected on the air samples.

Also provided by EML are the MoldSTAT™ Supplementary Statistical Spore Trap Reports which compared each of the indoor air samples to the outside air samples collected on the day of sampling. This statistical evaluation provides a review of the comparison of the total mold spore concentration and type of mold spores detected inside the building to that detected outside the buildings. The "Mold Score" analysis provided by EML in their reports provides a relative "score" ranging between 100 and 300 using a statistical algorithm method developed by EML. A "score" of 100 is considered low and indicates or supports the premise that the concentration and types of mold spores detected on the air sample has a greater likelihood of coming from outside of the building, from an outside source. A score of 300 is considered high and indicates a greater likelihood of the mold spores originating from inside of the building.

Thus, if the total indoor mold spore concentration levels were significantly greater than the outside levels, and specific mold genera concentration levels inside of the building were significantly different and also found to be significantly greater than the outside levels, this would not be acceptable and the Mold Score would reflect a high score. Generally, "significantly greater" implies 5-10 times greater in concentration inside the building versus outside. If on the other hand if the mold spore concentration inside of the building were less than the outside and the types of mold genera seen on the inside air samples were similar and also less than that seen outside, this would be deemed "normal" or acceptable, and the Mold Score would reflect a low score.



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The evaluation of the total mold spores inside of the building on the different floors and different areas was a combination of the evaluation made by Entek in looking at the results of the total mold spore concentration, the individual mold genera seen on the inside air samples versus the outside samples, and the Mold Score established by EML. Together, this evaluation provides support from the professional making the comparison of the analytical results and the statistical evaluation by the Mold Score algorithm developed by EML.

All of the "Mold Scores" on the air samples inside of the building were very low, which is indicative of no significant mold source inside of the spaces tested that would be contributing excessive mold spores into the occupied spaces. The results of the air sampling for total mold spores and culturable mold spores support the visual observations made inside of the building in which no major visible mold source was observed or identified.

There will always be some variability found in air sampling, hour by hour, day by day, month by month, and especially during different seasons. There will also be variability in sampling due to the randomness in distribution of spores in the air, doors and windows being open, and intake and filtration by the heating, ventilating, and air-conditioning (HVAC) system. The results of the air sampling on this investigation demonstrate this wide range in variability in mold spores measured both inside and outside of the building. The mechanical HVAC fan unit for the building was operating for the duration of all of my air sampling for both culturable and non-culturable mold spores, and the building was occupied by staff performing their typical operations. The concentrations of both culturable and non-culturable mold spores detected on our investigation were very low inside of the building and is partially due to the high quality filters used in the HVAC system.

It is important to realize that the results of the air sampling conducted by Entek cannot be duplicated, since there is so much variability in outside conditions, which can greatly influence the indoor concentrations. It is normal and typical to find the presence or absence of a few genera in small numbers with this type of sampling. This variability is also demonstrated in the many other air sample investigations for mold spores inside of the building prior to Entek's involvement.

Other Biological Particles Results by Non-viable Methodology

Also evaluated on the air samples collected onto the Air-O-Cell cassettes were other airborne particles from other sources including pollen, plant, animal (primarily skin cells), fungi, and other non-biological particles such as glass fiber, soot, starch and synthetic fibers. The primary airborne particles identified in all of the indoor air samples were epithelial skin cells, with the occupants of the building the source from normal shedding. Skin cells were not detected in the three air samples collected outside of the building. Other particles found in high numbers were soot-like particles in three locations inside of the building in greater concentrations than found outside of the building. The source of these soot-like particles is unknown and the significance is also unknown.

Other particles detected in lesser amounts inside of the building were starch, synthetic fibers, glass fibers, pollen, and trichomes (plant hairs), which may be due to some of the plants found inside of the various offices.

On the three outside air samples there were significantly more pollen observed of various types, and trichomes, due to the greater vegetation outside of the building. Pollen are relatively large in size and are easily filtered out from the mechanical heating, ventilating, and air-conditioning (HVAC) system; therefore, it is not surprising to observe much lower pollen concentrations inside of the building compared to outside.



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Bulk Sample Results

Carpet Dust Samples

Seven samples of carpet dust were collected to evaluate mold spores in the carpet of the 21st floor, 22nd floor, and 23rd floor. In addition, one bulk sample was collected on the 18th floor for comparison to the other three floors. Sampling of the dust was performed using a 0.8 micron mixed cellulose ester filter attached to a high volume pump with tygon tubing at a flow rate of greater than 15 liters per minute. The plastic top section of the filter cassette was removed, and the open filter cassette was placed onto the carpet surfaces being vacuumed. The sample was collected as a composite sample comprised of at least three different approximately one square foot locations until a large enough bulk sample was collected into the cassette.

The samples were individually labeled and submitted to EML for evaluation by a staff analyst. The samples were diluted in a solution, and each were plated onto three different petri dishes containing different media, which included Cellulose, Malt Extract Agar (MEA), and Dichloran glycerol (DG 18). After several days of growth, the analyst identified the mold genera and species (if possible) and concentration. Results are reported in colony forming units per gram of dust (cfu/gm).

The total concentration of mold spores found in the carpet on the 23rd floor ranged between 888,000 cfu/gm and 2,024,000 cfu/gm; on the 22nd floor the concentration ranged between 112,000 cfu/gm and 7,232,400 cfu/gm; on the 21st floor the concentration ranged between 5,236,000 cfu/gm and 5,335,900 cfu/gm; and the one sample collected on the 18th floor the concentration was 596,000 cfu/gm.

The primary mold spores detected were *Aureobasidium* followed by yeasts. These two mold types comprised 86% to 99% of the total mold spores found in the settled dust. There were other mold spores detected by this method at much lower concentrations than for the two identified above, comprising the remaining 1% to 14% of the total concentration.

The carpet dust samples had a fairly diverse population of mold spore types, since carpeting in general serves somewhat as a "trap" of spores, dirt, skin cells, pollen, etc. deposited over many months to years. It is very interesting to note that although *Aureobasidium* mold spores were found in the greatest numbers of all mold spores, these spores were not detected in any of the air samples collected either inside or outside air samples by both air sampling methods. I cannot explain this discrepancy in the levels of *Aureobasidium* mold spores found in the carpet dust yet not found in the air samples. The concentrations of yeasts are primarily due to human activity inside of the building and is typically greater indoors versus outside.

There are no standards for mold spore levels in carpet dust; however, they can assist in evaluating settled particles which may have been deposited over many weeks, months, or years depending upon the frequency and thoroughness of the carpet cleaning. The concentrations mold spores considered primary water indicators include *Aspergillus*, *Penicillium*, *Chaetomium*, *Stachybotrys*, *Fusarium*, and *Ulocladium* to name a few of the more common mold genera. There were very few of these types of spores detected in one or more of the samples collected. These water indicator mold spores were found in low concentrations in the samples collected and is common to find low levels with this type of sampling.

One of the conclusions I can make from the sampling of the mold spores in the carpet dust is the concentrations found over one million probably reflect poor housekeeping of the carpets in the offices tested. The total mold spore loading in relatively clean carpets are typically found to be less than one million cfu/gram. The air samples by both sampling methods indicate very low airborne mold spore levels and are to carry more weight in determination of human exposure compared to settled dust in the carpet. Therefore, high loading of mold spores in carpet dust is primarily indicative of inadequate cleaning techniques or infrequent cleaning or both.



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Results of Settled Particulate Evaluation

To further evaluate the settled particles in the carpeting I collected four samples of settled particulate from the carpeting using the same method of sample collection described previously for mold spores in the carpeting. Three bulk samples were collected on the 22nd floor and one sample was collected on the 23rd floor. The bulk samples were collected onto a 0.8 micron mixed cellulose ester filter in a plastic cassette connected by Tygon tubing to a sample pump to act as a vacuum cleaner to collect the sample. The samples were submitted to Forensic Analytical Specialties, Inc. of Hayward, CA for particle identification using polarized light microscopy (PLM).

Attached are the analytical results of the particle analysis, which includes a breakdown of the *Fibrous* and *Non-fibrous* fractions in the sample. In general, there were similar findings of all four bulk samples. Of the *fibrous* fraction, the samples were found to have major amounts (greater than 10%) of cotton fibers and cellulose. The primary source of cotton is from clothing worn by the employees. There were trace amounts (< 1%) of synthetic fibers, wool, Nylon, mineral wool, trichomes (plant hairs), paper, feathers, and cat hair.

Of the *non-fibrous* fraction, there were major amounts (greater than 10%) of epithelial (skin) cells and organic debris detected. There were minor amounts (1-10%) of iron oxide, limestone, opaques, and quartz. There were trace amounts of various fungal spores, pollen, feldspars, flyash, clear isotropics, gypsum, insect parts, metal chips, paint chips, spray paint, Phenolic foam, mica, inkjet printer ink, Perlite, quartz, and starch.

These analytical findings are very typical of indoor air particulate found in many other investigations by Entek and they will vary somewhat in the composition percentages in different buildings, but generally the variety and distribution of the different biological, mineral, and man-made particles is common. The settled particulate found at office work stations are reflective of particles brought in from the outside environment or generated inside of the building, which are eventually released from the supply ducts during operation of the fan system due to air flow and vibration or brought in by the occupants.

Of particular note, were the major amounts of organic debris found on all four bulk samples collected as part of the non-fibrous component. In other investigations, I generally have not found organic debris as a major component. Similar to the mold in carpet dust results, high dust loading of particulate in carpets many times is directly related to the inadequate cleaning techniques or infrequent cleaning or both.

Review of Historical Air Sampling for Mold Spores

I have been provided air sampling data from seven previous mold sampling investigations at the Board of Equalization BOE building dating back to June 22 of 2004. Attached to this report is a "Summary of Historical Mold Spore Sampling Results at Board of Equalization; 450 N Street, Sacramento, CA" table providing a summary of the dates of sampling, indoor and outdoor mold spore concentration, average mold spore concentrations, and the predominant mold spores detected in rank order. This table provides a good summary of all previous investigation sample results including the results by Entek. Included are the individual reports, some with laboratory data and some including summary tables.

There have been 172 air samples collected for total non-culturable mold spores inside of the BOE building since 2004, including the 14 air samples collected by Entek on May 17, 2007. Of these 172 air samples there have been 33 air samples collected on the 22nd floor and analyzed for total non-culturable mold spores. The mold spore concentrations on the 22nd floor have averaged 117 spores/m³. For comparison, the remaining samples collected for other floors of the building have averaged 191 spores/m³.

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As seen on the summary table of results for all investigations the concentration of mold spores detected outside of the building ranged from a low of 701 spores/m³ to a high of 25,203 spores/m³. The indoor concentration of mold spores in all investigations including on the 22nd floor were all less than the outside mold spore concentration.

In addition, the type or genera of mold spores detected in the building including the 22nd floor have been very similar to that found outside of the building except at much lower concentrations. There is no evidence in the 172 air samples collected inside of the building including the 33 air samples collected on the 22nd floor of significantly different mold spores inside of the building compared to the type of mold spores detected outside the building. The low numbers of similar mold spores detected inside of the building is reflective of mold sources outside of the building, not inside.

Visual Inspection

During my two visits to the building, visual inspections were made for mold growth in obvious areas of the building where water intrusion has been noted previously. In the past, the attic space of the south side of the 22nd floor directly below the balcony had water entering the building in this location resulting in removal and replacement of the 2 x 4 drop-in ceiling panels and any wet fiberglass insulation batting on the underside of the metal roof deck, according to the engineering staff. There were at least four locations of the attic space at this south area below the balcony area I inspected for mold. I did not observe any visible mold growth in the areas inspected. The attic space serves as a return air plenum and is under a negative pressure relative to the occupied space below. Thus, air flow in the attic space will be drawn back to the mechanical HVAC system and the likelihood of entering the occupied space below is minimal.

I also reviewed areas of the base of walls on the 23rd floor along the south perimeter wall adjacent to the balcony, and on the 22nd floor in areas of known past water flooding. These visual inspections included peeling back small sections of the rubber base cove on the lower wall and inspecting the base of the gypsum wallboard at 12 locations in the building on the 22nd floor and 23rd floor. There were only two of the twelve locations inspected where very minor amounts of suspect mold growth was observed at the base of the wall behind the rubber base cove. The two locations included the south perimeter wall of the 23rd floor at the cubicle near column K-19. The second location was in the small office room 2206 at the south wall, where visible rust was also observed on the carpet near the south wall. In the other ten locations inspected, no visible mold was observed on the lower drywall surfaces behind the base cove. The conservative approach and general rule of thumb for mold growth on drywall material is to remove and replace the damaged drywall material.

Summary

The air sampling for mold spores by Entek Consulting Group, Inc. was limited in scope and included the 21st, 22nd, and 23rd floors of the building. Air samples were collected on the 18th floor for comparison, since there were no complaints on this floor. Air sampling by culturable and non-culturable methods found levels of mold spores to be much lower than the air samples collected outside of the building, indicative of no major mold source inside the areas tested that might be contributing significant mold spores into the occupied spaces. The results of the air sampling support the visual inspection made inside of the occupied spaces on the 22nd and 23rd floors, in which there were no significant mold sources identified inside of the building.

The results of the air sampling by Entek were similar to the results of previous investigations involving other floors of the building, as well as, the 22nd floor. The concentration of mold spores on the 22nd floor of the building from 33 air samples collected since 2004 did not find elevated levels of mold spores compared to the outside air, which is the basis of comparison, and the type of mold spores or genera were not dissimilar to those mold spore types detected in the outside air samples.



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From investigations beginning in 2004, mold spores concentrations from 33 air samples collected on the 22nd floor have averaged 117 spores/m³. For comparison, the remaining 139 air samples collected on other floors of the building averaged 191 spores/m³.

It has been my pleasure working with you on this investigation. Thank you for choosing Entek Consulting Group, Inc. for your environmental needs. Please call me at ((16) 632-6800 if you have any questions regarding this report.

Sincerely,

A handwritten signature in black ink that reads "Richard Beall".

Richard Beall, CIH, CSP
President

Enclosures

C:\Entek\Clients\StateCompInsuranceFund\07-534 Board of Equalization Mold\Mold Investigation Report.wpd

Summary of Historical Mold Spore Sampling Results at Board of Equalization; 450 N Street, Sacramento, CA

Dates of Sampling	Floors Tested	# of Air Samples Indoors	Mold Spore Concentration Range Indoors (s/m³)	Average Spore Concentration Indoors (s/m³)	Outside Spore Range (s/m³)	Outside Spore Average (s/m³)	Mold Spores Rank Order Indoors	Mold Spores Rank Order Outdoors
June 22, 24 July 8, 2004	2,3,22,24	35	13-186	52	1,293-2,479 n=4	1,706	Asco-sporium Cladospo- Basidio-sporium	Cladospo- Asco-sporium Basidio-sporium
Oct. 27 & 28 2004	2,3,11,22,24 (missing results of floor 2)	28	< 13-240	38	1,627 n=1	1,627	Basidio-sporium Cladospo- Pen/Asp**	Basidio-sporium Cladospo- Pen/Asp**
Nov. 15, 2005	22	3	360-640	480	10,811 n=1	10,811	Pen/Asp** Basidio-sporium Cladospo- Asco-sporium	Cladospo- Basidio-sporium Asco-sporium
Feb. 21 & 24, 2006	Room 327	4	93-293	186	3,639 n=1	3,639	Asco-sporium Basidio-sporium Pen/Asp**	Asco-sporium Basidio-sporium Cladospo- Asco-sporium
Jan. 7, 2006	2,3,7,9,11,15,18, 20,22,24	40	< 13-587	94	1,894-25,203 n=12	10,337	Pen/Asp**	Basidio-sporium Asco-sporium Pen/Asp**
Jan. 8, 2007	1,(2 or 20),3,22	30	27-3,892*	480	4,079 n=1	4,079	Asco-sporium Pen/Asp** Basidio-sporium Pollen	Asco-sporium Cladospo- Basidio-sporium Pen/Asp**
Jan. 19, 2007	1,2,3,22	18	< 13-1,346*	301	2,000 n=1	2,000	Pen/Asp** Cladospo- Asco-sporium	Cladospo- Asco-sporium Pollen Pen/Asp**
May 17, 2007 Entek Non-culturable	18,21,22,23	14	27-734	106	701-2,356 n=3	1,428	Cladospo- Pen/Asp** Basidio-sporium Asco-sporium	Cladospo- Pen/Asp** Basidio-sporium Asco-sporium
May 17, 2007 Entek Culturable	18,21,22,23	14	< 7-296	50	706-1,058 n=3	992	Cladospo- Asco-sporium	Cladospo- Asco-sporium

* 1st Floor Lobby ** Pen/Asp = Penicillium/Aspergillus Type Spores