

SCIENTIFIC AFFAIRS

March 1992

-Issue Manager: Kay Thomas Packett

Institute staff and consulting scientists finalized and submitted to the Occupational Safety and Health Administration all comments responding to the Agency's Request for Information on indoor air quality. We also continued work on EPA projects and began working in earnest on scientific projects deferred during preparation for the OSHA response.

Project and Activity Status

OSHA

*** Scientific Submissions**

- We submitted TI comments and coordinated submission of comments by the following consultants: HBI, Feuer/Leber/Moore, Meckler, Flamm, Sterling, Holcomb, Reasor, Switzer, Witorsch, Wu, LeVois/Layard and CanTox.
- Based on continued discussions with counsel and company representatives, we determined not to submit the Miller/Tollison analysis of the potential costs of a federally-mandated smoking ban.
- Based on discussions with consultants and counsel, we abandoned for purposes of the March 21 deadline efforts to obtain and provide to OSHA information on the likely costs of a ventilation regulation.

*** Labor Submissions**

- The AFL-CIO filed comments encouraging OSHA to issue an IAQ regulation and encouraging the Agency to adopt a building systems approach rather than attempting to regulate on a contaminant-by-contaminant basis.
- Labor consultants continued working with other labor unions on the response to the RFI.
- The National Energy Management Institute submitted extensive comments in response to the RFI along with copies of articles from the literature documenting the IAQ problem and potentially effective solutions.

*** Other Activities**

- Representatives from the National Energy Management Institute met with representatives of the OSHA Health

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TI DN 0024910

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Standards Program office to discuss the RFI and NEMI's recommendations for an indoor air quality regulation.

- The AFL-CIO filed a petition with OSHA formally requesting that the Agency proceed with an indoor air quality regulation focusing on a ventilation and building systems approach rather than on specific contaminants.

EPA

* **Scientific Submissions**

- Layard/Switzer Project: Layard and Switzer completed revisions to their analysis of the ETS risk assessment based on TI review, submitted the analysis to EPA and forwarded it to Risk Analysis, published by the Society for Risk Analysis, for possible publication.
- Layard Background Exposure Project: Layard submitted to Environment International his analysis of adjustment for background exposure in the ETS risk assessment. The paper previously was submitted to EPA staff.
- Todhunter Project: We continued working with TI and product liability counsel to resolve problems with the Todhunter analysis intended for submission to EPA. However, indications are that it will be difficult to resolve concerns soon enough for the analysis to have meaningful impact during EPA's revision of the ETS risk assessment.

General

- * **Hearings:** We monitored and reported on a hearing held by the House Science, Space and Technology Committee regarding the role of science at EPA.
- * **Publications/Responses to Publications**
 - Steenland Response: We received, reviewed and provided comments on a first draft of a proposed response to the Steenland article in the Journal of the American Medical Association regarding the claimed association between ETS and risk of heart disease.
 - Fonham Response: We continued pressing consultants for an overdue draft response to the Fonham study on ETS and lung cancer.

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* **Conferences, Meetings and Presentations**

- Prevention '92: At company request, we monitored a presentation by EPA's James Repace at Prevention '92, the annual meeting sponsored by the American College of Preventive Medicine.

Needs Attention Next Month

Coordinate industry strategy regarding OSHA reform and indoor air quality legislation.

Complete response to latest NIOSH letter regarding the Current Intelligence Bulletin on ETS.

Begin considering additional research needs and planning projects for OSHA use in development of a draft IAQ standard.

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Complete response to latest NIOSH letter regarding the Current Intelligence Bulletin on ETS.

Begin considering additional research needs and planning projects for OSHA use in development of a draft IAQ standard.

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