

Carpet and Rug Institute

INTEREST

Avoiding additional regulation of products manufactured by CRI members.

POSITION

Supports efforts to develop new test methods for indoor air contaminants and to promote research on indoor air quality. Opposes product emission-rate labelling except as provided for under existing law. Opposes provisions of H.R. 1066 that would require manufacturers to disclose the chemical make-up of products supplied to the federal government for new construction. Supports voluntary efforts to reduce product emissions, such as the current Carpet Policy Dialogue.

Chemical Specialty
Manufacturers Association

INTEREST

Avoiding additional regulation of chemicals and consumer products manufactured by CSMA members.

POSITION

Maintains that more research is needed before we can justifiably confer any new regulatory authority over indoor air contaminants. Opposes product labelling provisions on the grounds that products whose inhalation might pose a threat to human health are already regulated under FHSA and FIFRA and that consumers do not benefit from, and may be misled by, information about a product's TVOC emissions.

**National Energy Management
Institute**

INTEREST

Promoting the adoption of the ASHRAE standard.

POSITION

Advocates immediate action to improve ventilation and specifically supports mandatory adoption of the ASHRAE ventilation standard wherever possible. Advocates certification of contractors and professionals in fields related to indoor air quality.

SMACNA

INTEREST

Promoting the adoption of the ASHRAE standard (to which SMACNA contributes), compliance with which will require the services of SMACNA members.

POSITION

Advocates immediate action to improve ventilation (generally) and specifically supports mandatory adoption of the ASHRAE ventilation standard wherever possible. Advocates certification of contractors and professionals in fields related to indoor air quality.

LABOR

American Federation of
Government Employees

INTEREST

Protecting membership and making employers responsible for ensuring good indoor air quality in workplaces.

POSITION

Supports the principles of H.R. 1066, but believes that the bill could be improved by giving OSHA, rather than NIOSH, authority over the federal building remediation program, by designating OSHA as the lead agency with respect to workplace IAQ, and by giving OSHA jurisdiction over all workplaces -- private, public and federal.

AFL-CIO (Testimony also heard from the Service Employees International Union)

INTEREST

Protecting membership and making employers responsible for ensuring good air quality in workplaces.

POSITION

Supports a building-systems approach on the grounds that it is more pragmatic and will achieve faster results. Calls on Congress to direct OSHA to issue an indoor air quality standard (but opposes wholesale adoption of ASHRAE standard). Supports inter-agency collaboration so long as OSHA maintains jurisdiction over the issue with respect to workers. Advocates the setting of clear standards of accountability for workplace indoor air quality problems.

American Federation of Teachers

INTEREST

Ensuring good indoor air quality in schools and other institutions with special ventilation problems.

POSITION

Generally supports H.R. 1066. Believes that Congress should give OSHA a deadline for promulgation of a workplace indoor air quality standard, and that EPA should be required to promulgate an identical standard to apply to employees of state and local governments in states which do not have an approved plan under OSH Act Section 18. Calls on Congress to require EPA to design a model indoor air quality remediation program for schools and other institutions with special ventilation problems.

Communication Workers of America

INTEREST

Protecting membership and making employers responsible for ensuring good indoor air quality.

POSITION

Supports promulgation of an indoor air quality standard by OSHA.

Laborers' Health and Safety Fund of North America

INTEREST

Worker protection and assignment of responsibility and liability.

POSITION

Advocates designation of EPA as the lead agency on indoor air quality and as permanent chair of the council on indoor air quality, although OSHA should retain responsibility for workplace indoor air quality. Calls on Congress to mandate the issuance of an interim indoor air quality regulation within six months of enactment.

Requests that construction activity be specifically addressed in Sections 5 (Research) and 6 (Management Practices and Ventilation Standards) of H.R. 1066.

National Federation of Federal Employees

INTEREST

Protecting membership and holding federal government responsible for ensuring good air quality in federal workplaces.

POSITION

Supports mandatory federal ventilation standards for public and commercial buildings. Advocates self-enacting regulations if EPA fails to act. Supports issuance of a workplace indoor air quality standard by OSHA. Supports mandatory disclosure of chemical composition of products used in federal buildings.

Service Employees International Union, AFL-CIO

INTEREST

Protecting membership and making employers responsible for ensuring good indoor air quality in the workplace.

POSITION

Believes that poor indoor air quality is caused by insufficient fresh air, chemical contamination and microbiological contamination. Believes that building owners will not take sufficient action to improve building ventilation systems in the absence of rules or regulations. Believes that OSHA has been extremely lax in addressing this issue. Strongly supports H.R. 1066 and S. 455.

PRIVATE ORGANIZATIONS AND ASSOCIATIONS

American College of
Occupational Medicine

INTEREST

Association of physicians specializing in occupational and environmental medicine. Concerned with maintaining recognized medical standards in diagnosis of occupational health ailments.

POSITION

Supports further research into the health effects of poor indoor air quality, particularly multiple chemical sensitivity, which ACOM currently regards as an ill-defined phenomenon. Believes that OSHA should retain the lead role in workplace indoor air quality issues.

American Lung Association

(Testimony before Environment Subcommittee delivered by James E. Woods, Professor at Virginia Polytechnic Institute, whose own testimony is reviewed below.

Testimony before Health and Environment Subcommittee delivered by Thomas Godar, Director of Pulmonary Disease Section, St. Francis Hospital and Medical Center.)

INTEREST

Health.

POSITION

Supports a federal ventilation standard, but one that is closely modeled on ASHRAE 62-1989. Where the ventilation rate requirements of that standard cannot be met (as may be the case in some existing buildings) ALA advocates the use of the standards "Air Quality Procedure," which includes source-control strategies. Supports labelling disclosing the contents of products purchased by consumers and builders. Calls on Congress to dedicate "clear regulatory authority" to EPA, while maintaining that the central element of the federal indoor air program should be research.

ASHRAE

INTEREST

Promoting the widespread adoption of their most current standards.

POSITION

ASHRAE believes that the appropriate role of the federal government is to sponsor research and development programs and to "encourage" states and localities to adopt the most up-to-date version of the ASHRAE ventilation standard in its entirety.

ASHRAE specifically criticized the ventilation standard for new public and commercial buildings proposed in H.R. 1066 as being simplistic.

Coalition on Smoking OR Health
(American Lung Association,
American Heart Association,
American Cancer Society)

INTEREST

Health.

POSITION

Finds ETS to be the "single largest pollutant in the indoor environment" and supports regulatory action by EPA to reduce exposure to the greatest extent possible.

Consumer Federation of America

INTEREST

Nonprofit advocacy group for consumer issues.

POSITION

Supports programs which make information on indoor air contaminants more available to the public, including government health advisories and mandatory product labelling. Believes that EPA should be given greater authority to regulate indoor air contaminants, and advocates immediate action to ban certain contaminants, such as tobacco smoke.

Also supports the promulgation of federal ventilation standards and a mandatory review by OSHA of the need for a workplace indoor air quality standard.

National Center for
Environmental Health
Strategies

INTEREST

Non-profit research and advocacy organization for the chemically sensitive.

POSITION

Calls for more research on indoor air quality issues, especially regarding chemical sensitivity, but also feels that regulatory solutions, such as the banning of tobacco and deodorizers in public and commercial buildings, should be implemented at this time. Favors product labelling, but believes that disclosure of TVOC emissions is at best useless and at worst misleading. Supports mandatory ventilation standards (the ASHRAE standard being the absolute minimum) and PELs for non-industrial workplaces.

THE ADMINISTRATION

The Administration opposes new indoor air quality legislation on the grounds that such legislation would disrupt a long-standing and effective federal indoor air quality program, would create conflicting responsibilities among federal agencies, and would undermine federal priorities in this area. The following agencies have testified this Congress on indoor air quality legislation:

Environmental Protection
Agency

TESTIMONY

EPA maintains that it possesses sufficient statutory authority to regulate indoor air contaminants under the Toxic Substances Control Act and the Federal Insecticide, Fungicide and Rodenticide Act, and that it is developing methods to exercise those authorities more efficiently. EPA has also developed a new approach to addressing indoor air quality problems which calls for source control wherever feasible, adequate ventilation at all times, and air cleaning as appropriate. EPA plans to pursue this strategy on both research and policy fronts and believes that new indoor air quality legislation will only serve to divert its resources to narrow, source-specific approaches that may ultimately have little impact on the problem.

Occupational Safety and Health
Administration

POSITION

Maintains that OSHA already has ample statutory authority to address indoor air quality in the workplace and that new legislation would confuse and perhaps impede their progress in this area. Indoor air quality can currently be addressed through a number of existing regulations, including those concerning Permissible Exposure Limits (PELs), industry ventilation standards, and the Hazard Communication Standard. In order to determine whether a specific indoor air quality standard is necessary, OSHA is preparing a Federal Register notice which will request all available information on indoor air quality issues.

Consumer Product Safety
Commission

TESTIMONY

CPSC testified specifically on Section 16 of H.R. 1066 which would have required EPA and CPSC to establish testing methods and labeling requirements for chemical emissions from certain consumer products. CPSC maintains that sufficient authority already exists under the Federal Hazardous Substances Act to advise consumers of significant health hazards, and that the requirements of Section 16 would be "extraordinarily complex and difficult to implement." CPSC further believes that the assumptions of Section 16 were misguided as risk depends not only on emissions rates but on the toxic potency of the ingredients and the conditions of use. The Commission is also in the process of developing guidelines for determining when a product presents a risk of chronic toxicity.

National Institute for
Occupational Safety and
Health, HHS

TESTIMONY

Regarding H.R. 1066, NIOSH testified that "the Administration opposes this bill" and made the following specific comments:

- o The Healthy Buildings Baseline Study provided for in Section 5(i) is unnecessary as NIOSH already possesses ample authority to initiate such a study, and will soon do so.

- o The bill's requirement (under Section 9) that NIOSH monitor all indoor air activities and remediation efforts in federal buildings is unnecessary in light of a soon to be released program on indoor air quality management practices and would divert NIOSH from its role as a research agency.

- o Authority provided under the Building Assessment Demonstration Program would assist NIOSH in addressing indoor air quality problems in state and municipal buildings.

Department of Energy

TESTIMONY

DOE testified that H.R. 1066 would provide no useful additional authority to address indoor air quality and would impede progress by imposing unproductive requirements and deadlines. Specifically, DOE also testified in opposition to the product emissions rate labeling requirements of the bill, saying that the provision "assumes a level of understanding about the sources and effects of indoor air pollutants that doesn't exist"; in opposition to the promulgation of a single ventilation rate for all public and commercial buildings saying that such a standard would be "of questionable value" and needlessly inflexible; and in opposition to the requirement that OSHA examine the need for a workplace indoor air quality standard, saying that such an inquiry would waste resources. DOE supports efforts to increase the public's awareness of the energy and productivity benefits of a healthier indoor environment.