

Sparber  
and  
Associates, Inc.

1325 Pennsylvania Avenue, NW  
Suite 500  
Washington, DC 20004

(202) 393-3240

May 6, 1993

**MEMORANDUM**

**TO:** Karen Fernicola Suhr & Kay Packett  
**FROM:** Joanna Hamilton  
**RE:** May 4 BCIA Board Meeting

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**I Attendance**

The following companies were represented at this meeting: Honeywell-Environmental Air Control, Dow, Eastman Kodak, Healthy Buildings International, the Meckler Group, Union Carbide, Owens-Corning, the National Particleboard Association, and the Carpet and Rug Institute.

**II Discussion**

o Meeting with Robert Axelrad: Axelrad addressed two topics in this (his third) meeting with the board -- IAQ legislation and lethal carpeting.

Axelrad said that EPA's testimony for the May 25 Senate hearing on S. 656 has not yet been drafted, but that it will read very much like their past testimony -- that is, support for the objectives of the Act followed up by the assertion that the Act is not necessary to achieve those objectives. Given the change of administration, it will lean more towards endorsement than in the past, but Axelrad is genuinely fearful that IAQ legislation will be passed but that the appropriation for implementing it won't be. On the other hand, he did admit that indoor air is something of a poor step-child at EPA because it's not subject to any statutory deadlines, and that a few such deadlines could move IAQ up the scale of priorities at the agency.

In response to questions as to whether he saw a need for increased regulatory activity in this area, Axelrad said that even if he had a larger budget, that is not the direction he would go in. On the same subject, Axelrad maintained that the national response program proposed in S. 656 confers no new regulatory authority -- he sees it as little more than a requirement that the agency articulate its plans and programs to

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Congress. However, when Paul asked whether EPA would put this position on record at the May 25 hearing, Axelrad's voice dropped very low and trailed off towards a "maybe."

Axelrad also spoke at length on EPA's attempt to solve the death-by-carpeting mystery. Two class action suits have been filed on this issue, which appears to be overtaking smoking as the nation's number one threat to indoor air quality. I don't suppose you're interested in all of Axelrad's comments on this subject, but, for future reference, you may want to know that he has developed a pretty sour relationship with Sanders' office over it. He has particular contempt for Sanders' staffer (Doug Boucher, I believe) who spends half of his air-time reminding people that he has a Ph.d. in biology.

o Source Management: Paul opened a discussion on BCIA's position on "source management." The members of the board (including Meckler and HBI) agreed that BCIA's inadmission of a role for source management has created the perception that we see ventilation as the IAQ cure-all. The board agreed that a new position should be drafted on source management, provided that it distinguishes clearly between source management and source reduction. The paper will be divided into three sections: The first, to be drafted by Simon, will define and describe source management, the second section will reiterate BCIA's position that sufficient statutory authority exists to regulate sources which are a serious threat to human health, and the third will assert BCIA's support for voluntary emissions reduction at the manufacturing stage. The board's reasoning in supporting this last position is that such emissions-reduction efforts are pursued due to marketplace demands for lower emitting products, rather than scientific findings of risk; therefore, voluntary reductions in emissions are appropriate, while mandatory programs for the same are not.

o ASHRAE letter: The Board decided that BCIA's letter to ASHRAE regarding the liability issue should be sent to the President of ASHRAE in early June. Bruce Dickson is working on a second draft of the letter.

o Menzies article on the relationship between ventilation and SBS: Axelrad reported that an official at NIST (Andy Persily) has studied the Menzies article (which concludes that increased ventilation has no improving effect on indoor air quality, so far as the occupants are concerned) and found serious flaws in it. In particular, Persily believes that the ventilation rates reported in the study have been calculated wrongly, and that they may have been no higher than half of the reported rates. Simon Turner and Paul will follow up this question with both Menzies and Persily.

o Rohm & Haas study on "back-pressure": This is the study that concludes that high ventilation rates may increase the level of contaminants entering the indoor air by lowering the vapor

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cc: Mike Forscey

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