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Arthur Moore
General President

SHEET
METAL
WORKERS'
INTERNATIONAL
ASSOCIATION

March 24, 1994

The Honorable Henry A. Waxman, Chairman
Health and Environment Subcommittee
House Energy and Commerce Committee
United States House of Representatives
Washington, DC 20515

Dear Representative Waxman:

On behalf of the Sheet Metal Workers International Association (SMWIA), AFL-CIO, I am writing to express our opposition to H.R. 3434, the Smoke-Free Environment Act of 1993.

As you may know, our union has a wealth of technical experience related to indoor air quality as a result of our members' ongoing interaction with ventilation system design, operation and maintenance. Together with our unionized sheet metal contractors, we operate the National Energy Management Institute, a non-profit organization with particular expertise in indoor air quality issues. With this as background, we would like to share our concerns with H.R. 3434.

Specifically, the SMWIA opposes the Act's establishment of Environmental Protection Agency (EPA) jurisdiction over indoor air quality in the workplace. We are convinced that the EPA lacks the requisite technical and practical experience in the indoor air quality field, particularly in the area of ventilation system design, operation and maintenance, which would be required under Section 2701, Subsection (C) (1) of the Act. More properly, this authority should remain with the Occupational Safety and Health Administration (OSHA).

H.R. 3434 also diverts much needed attention from the broader issue of protecting workers from the wide and growing spectrum of indoor air constituents, including bacteria, fungi, chemicals and solvents, carbon monoxide and a range of volatile organic compounds. The proposed bill does nothing to protect workers from these workplace hazards.

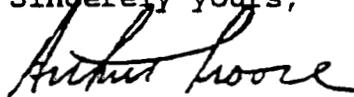
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Alternatively, we are very supportive of OSHA's effort to develop a comprehensive IAQ standard, for which we understand rule making is imminent. We urge you to oppose H.R. 3434 while supporting OSHA's jurisdiction and action on this critical issue.

Thank you for your consideration of this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Arthur Moore".

Arthur Moore
General President

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