



NATIONAL ENERGY MANAGEMENT INSTITUTE

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Richard Peck
Executive Director

April 5, 1994

The Honorable Henry A. Waxman
2408 Rayburn HOB
Washington, DC 20515-4099

RE: Indoor Air Quality

Dear Representative:

Over the past few weeks, the National Energy Management Institute (NEMI) contacted you to express our opposition to H.R. 3434, the Smoke Free Environmental Act of 1993. At that time, we explained that NEMI believed that this bill was mis-guided. In the light of recent events, we believe it is important to reiterate these reasons.

NEMI is a joint labor-management trust of the sheet metal industry, founded by SMACNA and SMWIA [spell out each]. NEMI joins with the AFL-CIO in its opposition to giving jurisdiction to another federal agency, EPA, over an issue, environmental tobacco smoke (ETS) that is closely tied to many other occupational exposure issues in the workplace. This is precisely what H. R. 3434 would do.

On March 25th, OSHA and the Department of Labor have announced a proposed rulemaking plan regarding indoor air quality in the non-industrial workplace. We are deeply concerned that the Committee's pursuit of H. R. 3434 will significantly hinder the efforts by OSHA to move forward on a comprehensive indoor air quality standard.

NEMI provided extensive documentation to OSHA that demonstrated our Institute's depth of experience in the proper application of ventilation to solve indoor air quality problems. Thus, we are convinced that it is essential that OSHA address the entire indoor air quality issue. This would be jeopardized by H.R. 3434.


Based on this wide-ranging, practical experience with solving indoor air quality problems, NEMI believes that a bill which is focused on ETS is incorrect. Addressing only ETS leaves millions of American workers exposed to dangerous indoor pollutants which are invisible, odorless, and tasteless. The EPA's day care center, a non-smoking facility, recently experienced a near deadly case of carbon monoxide poisoning, due to improper ventilation system design and operation.

It would be a serious mistake if congressional action on ETS resulted in slowing or stopping the issuance of a thorough, broad-based indoor air quality standard. Separating ETS from IAQ would likely result in such a situation.

The final point is that the experience of NEMI and practicing professionals in the indoor air quality field fully concur with the findings published by NIOSH. Their Congressional testimony stated that inadequate ventilation was the cause of poor indoor air quality in over 50 percent of the buildings studied: ETS was 2 to 4 percent of the problem.

NEMI appreciates your consideration on this important issue. We look forward to your response.

Sincerely,


Richard L. Peck
Executive Director

RLP/lw