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July 17, 1992

MEMORANDUM

TO: Karen Fernicola Suhr
FROM: Joanna Hamilton *JH*
RE: July 16 BCIA Board Meeting

Attendance

The following companies were represented: Environmental Air Control, Union Carbide, Dow, the Meckler Group, Air Products, HBI, and Owens Corning. A representative of the National Particleboard Association was also present.

Discussion

1. **OSHA strategy:** Much of the discussion at this board meeting focused on BCIA's overall strategy of pursuing a general IAQ regulation at OSHA. Neil Hawkins (Dow Chemical) suggested that, in light of the recent 11th circuit appeals court ruling striking down the 1989 PELs, BCIA should reconsider this approach because it might now be possible to avoid regulation altogether. Paul opened the issue for debate, but advised the Board that it was wrong to assume that if OSHA doesn't regulate no other agency will. In the end, the Board reaffirmed BCIA's strategy of pursuing an OSHA regulation in order to forestall something worse at EPA. Because the 11th Circuit Court ruling may have made promulgation of a very general IAQ regulation more difficult, the Board agreed to assemble evidence for an OSHA IAQ standard in specific environments as at least a first step to a general workplace standard.

The question as to whether to pursue a regulation through legislation was also raised. The general feeling was that the OSHA reform bill is the best vehicle for the provisions we are seeking, but that we should be very circumspect in supporting broader IAQ bills which could attract a lot of source control appendages.

2. **EPA Reorganization:** Paul reported that Bob Axelrad is not

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pleased with reorganization plan, which would shift the indoor air division from the Office of Atmospheric and Indoor Air Programs (under Eileen Claussen) to the Office of Radiation Programs' Radon division (under Margo Oge). Paul feels that Axelrad will be forced to act in a more regulatory mode in the Radon office and that he may leave as a result. Naturally, because of his connections with Axelrad, Paul is disturbed about this possibility.

3. Building-systems approach: In a recent conversation with Axelrad, the latter discussed "source management," as opposed to "source control," as a new approach to improving IAQ. Paul offered this as evidence that Axelrad is moving closer to BCIA's position. The Board decided that if this is really a new approach, and not just a new euphemism, we should incorporate it into our position because it has "elements of practicality." Only one example was discussed -- office space that is occupied while still under construction -- but there are obviously others, such as smoking sections. It seems that any acceptance of the principle of "source management" will have to be very carefully delimited if we are to keep the building-systems approach intact.

3. ASHRAE: Paul has been assigned to a subcommittee of the Health and Comfort Subcommittee called "Approaches to defining 'Acceptable' IAQ." As Paul reads it, Chairman Bill Cain (Yale University) is generally reasonable and attempting to balance the more extreme views of Gene Tucker (EPA) and Ole Fanger (primary author of the new EC guidance document for ventilation requirements in buildings).

Meckler raised the issue of ASHRAE venturing outside of its area of expertise in addressing health issues. The Board agreed that ASHRAE should attempt to promote health standards set by professional medical and health organizations, but not try to establish the health standards themselves. Paul will communicate this to Cain.

4. Public Relations Program: The Board agreed to conducting a seminar on the OSHA RFI in the Fall. Several members suggested that regional seminars, featuring regional agency staff, might also be worth considering for next year.

5. Technical Committee/ SAB Environmental Engineering Committee, Indoor Air Engineering Research Subcommittee (IAERS): On July 20 and 21, the IAERS is holding an open meeting on the overall indoor air engineering research program (see attached Federal Register notice). BCIA will be making comments, primarily to maintain its rapport with the SAB. The report on the research program is being sent to you under separate cover. Let me know if you would like any input into the preparation of these comments.

Attachments
cc: Mike Forscey

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