

AMERICAN FEDERATION  
OF LABOR AND CONGRESS  
OF INDUSTRIAL ORGANIZATIONS



January 14, 1994

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**The Honorable Joseph A. Dear**  
**Assistant Secretary for Occupational**  
**Safety and Health**  
**U.S. Department of Labor**  
**200 Constitution Avenue, N.W.**  
**Washington, D.C. 20210**

**Dear Assistant Secretary Dear:**

The undersigned organizations represent millions of workers potentially affected by the pervasive problem of poor indoor air quality in the workplace. On their behalf, we are writing to urge you to move forward with proposed comprehensive regulations on indoor air quality without delay.

Most of the undersigned organizations were signatory to the March 1992 petition by the AFL-CIO and 14 affiliated unions, in which we requested that OSHA begin rulemaking on a comprehensive indoor air quality standard. In that petition we described the many adverse health effects associated with poor indoor air quality and the large number of workers affected by indoor air quality problems. As you may know, the Environmental Protection Agency has consistently ranked indoor air pollution as one of the top five risks to public health, and has estimated the cost of indoor air pollution in terms of medical expenses and lost productivity to be tens of billions of dollars each year. Yet despite the pervasive nature of the indoor air quality problem and our request for prompt action by OSHA, to date we have received no substantive response to our petition and OSHA has not yet proposed regulations on indoor air quality in the workplace.

We recognize and appreciate that you have only been confirmed as Assistant Secretary for two months, and that many pressing occupational safety and health issues demand your attention. Still, rulemaking on indoor air quality is an important worker health issue that deserves your prompt consideration. The issue has been pending before the agency for far too long. OSHA needs to act on its statutory responsibility to protect the health and safety of American workers and move to issue comprehensive indoor air quality regulations without delay.

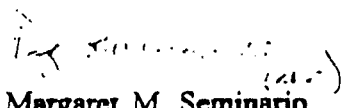
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Moreover, we recognize that the agency is faced with a difficult decision over whether and how to regulate environmental tobacco smoke (ETS) in the workplace. We respectfully suggest that to the extent OSHA believes it necessary and appropriate to develop regulations on ETS, that the most suitable context in which to develop these regulations would be as part of a comprehensive standard addressing the whole of the indoor air quality issue in workplaces. We are concerned that separate rulemakings on indoor air quality and ETS would require time and resources that OSHA cannot spare, and would needlessly delay action on one or both of the regulations. A standard addressing both IAQ and ETS in the context of an overall IAQ standard seems to us to be the most logical and efficient way for OSHA to proceed.

We hope that you will respond to our petition and take action on a comprehensive indoor air quality standard in the very near future. We stand ready to assist the agency as it moves forward on this important issue.

Thank you for your consideration.

Sincerely,

  
Margaret M. Seminario  
Director  
Department of Occupational  
Safety and Health  
American Federation of Labor and  
Congress of Industrial Organizations

(On behalf of the following organizations:)

American Federation of Government Employees  
American Federation of State, County and Municipal Employees  
American Federation of Teachers  
American Postal Workers Union  
Association of Flight Attendants  
Bakery, Confectionery and Tobacco Workers International Union  
Communications Workers of America  
Food and Allied Service Trades Department, AFL-CIO  
International Association of Fire Fighters  
International Brotherhood of Teamsters  
International Longshoremen's Association

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International Union of Operating Engineers  
Laborers' International Union of North America  
Service Employees International Union  
Sheet Metal Workers International Association  
The Newspaper Guild  
United Auto Workers Union  
United Food and Commercial Workers International Union  
United Steelworkers of America

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