



BUSINESS COUNCIL ON INDOOR AIR

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TO: BUSINESS COUNCIL ON INDOOR AIR MEMBERS

UPDATE ON ACTIVITIES

As we have not had the need for a meeting of the Business Council on Indoor Air (BCIA) during the past couple months, I thought it would be worthwhile to bring you up to date on some recent activities.

By-Laws and Officers

First I would like to welcome all of you to what promises to be a very active trade group. To those who have not yet either commented on, or approved, the by-laws distributed at the September 22 meeting, please call me as soon as you can with your thoughts. I would like to file our incorporation documents soon.

We also need to finalize our first year's officers. (In the future this will be done at meetings of the Board of Directors.) In a week or so we will be sending you a proposed list of officers for your consideration.

Next Meeting

Unless you indicate a desire to the contrary, I expect the next meeting of BCIA to take place in Washington, D. C. in early January to coincide with (1) the submission of EPA's report to Congress, and (2) the release of preliminary information on CPSC's study of biological contamination.

Environmental Protection Agency

Since we last met, EPA has published the following two documents related to indoor air: (1) "Directory of State Indoor Air Contacts," and (2) "The Inside Story: A Guide to Indoor Air Quality." If you would like a copy of the Directory, please return the attached form to BCIA. A copy of the Guide is attached to this memo.

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Those of you who reviewed drafts of the Guide (previously entitled "Understanding Indoor Air") will notice that much of the chemical-specific health effects discussion present in earlier versions was omitted from the final. While the document is far from perfect, I believe that most of the beneficial changes can be attributed, at least in part, to the substantive comments several of us submitted. Clearly, we need to continue interacting with EPA at all levels.

On November 10, EPA held a press conference to release its most recent study, one that involved the analysis of indoor air in ten office buildings. A copy of EPA's press release, including a fact sheet on the ten-building study, is attached. Also attached are summaries of the two volumes of the ten-building study. A copy of the complete study can be obtained by calling BCIA or by contacting EPA in Cincinnati (513-569-7562) and requesting the report by title ("Indoor Air Quality in Public Buildings"). Three articles resulting from the November 10 press conference also are enclosed.

While we are on the subject of office buildings, BCIA attended the Sick Building Syndrome Symposium, held by the Bureau of National Affairs (BNA) in Baltimore on November 1-2. I have attached an informative review of indoor air pollution litigation prepared by Stanley J. Levy, one of the symposium's speakers.

Many of you are aware that the next issue of EPA's Indoor Air Facts will address environmental tobacco smoke. In addition, EPA's report to Congress is about to enter its first round of internal review. At this rate I believe it is unlikely EPA will complete the report and deliver it to Congress before January, despite Don Clay's promise to Congressman Scheuer. The report will be a fairly long, three volumes. The first will discuss the federal government's activity in the indoor air arena during the past two years. The second will discuss recent findings regarding the assessment and control of indoor air quality. The final volume will address research needs.

The volume that may have the greatest immediate impact is Volume 2. Results of the Total Exposure Assessment Methodology (TEAM) studies will be presented in conjunction with unit risk numbers, leading to estimates of cancer cases for a variety of scenarios. (A recent article describing indoor exposures to chloroform prepared by Lance Wallace, the principal TEAM investigator, is enclosed.) Volume 2 also will describe the various indoor air standards employed by agencies around the world.

The report will not be distributed outside the Agency until it is ready for submission to Congress. I recently met separately with Eileen Claussen, Acting Deputy Assistant Administrator for Air and Radiation, and Robert Axelrad, Chief of

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EPA's Indoor Air Program. During both conversations I discussed the formation of BCIA, and it was generally agreed that BCIA is in an excellent position to facilitate interaction between EPA and industry by working closely with other trade associations. In this light, Axelrad believes it would be helpful if BCIA would coordinate a joint briefing of trade associations and other industry representatives interested in the report.

Consumer Product Safety Commission

Some results from CPSC's project on biological contamination also may be available in January. If this occurs, it may be worthwhile having Sandra Eberle, Program Manager of the Chemical Hazards Program, attend part of our meeting in January and brief us on the Commission's activities.

National Institute of Occupational Safety and Health

As noted in the attached article from the Occupational Safety and Health Reporter, NIOSH has begun a study of the Library of Congress' Madison Building. The study, which will begin in early 1989, is the latest phase in a history of indoor air quality activities at the Madison Building. What is not reported in the article, however, is that the study also will include EPA headquarters.

The problems at the EPA building continue to force the agency to address indoor air quality as more than just a policy question. I have attached the complaint filed by the National Federation of Federal Employers before the Federal Labor Relations Authority and testimony presented by the union at a Congressional hearing.

Congress

We also have visited with key staff of the House Energy and Commerce Committee and the Senate Environment and Public Works Committee to discuss the future of indoor air legislation. The mood on Capitol Hill is that indoor air legislation is non-controversial and would be fairly easy to pass, with little objection voiced as yet. The people with whom we spoke said there was a distinct possibility this legislation would be appended to another, more major bill (e.g., the Clean Air Act amendments). The legislation is expected to clarify the lead role of EPA, giving the Agency specific directions and tasks.

Regarding indoor air legislation, the most recent Inside EPA contained an interesting article describing the Office of Management and Budget's influence on EPA testimony on the legislation introduced in the House. A copy of the article is attached.

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Other Industry Activities

Although we have not conducted a thorough survey of Washington industry associations, you may be interested to know of some key groups' activities. I have spoken with several chemical-oriented trade associations, and they are all very interested in our group. It is clear from those discussions that we all look forward to close cooperation on this issue, resulting in a high level of consistency and efficiency.

While the National Association of Home Builders and the National Association of Realtors are not yet actively involved in indoor air, the Building Owners and Managers Association (BOMA) has been very active. Attached are a couple of articles on BOMA, which tends to espouse product substitution as the answer to indoor air problems. Doug Greenaway of BOMA was a speaker at the BNA conference in Baltimore.

An architect by the name of Hal Levin is putting together a "sick building manual." He also has just begun publishing a newsletter called Indoor Air Quality Update. As some of you may wish to subscribe, I have attached a copy of the newsletter.

We will continue to explore methods of coordinating activities with other trade groups. Please send me your views on which trade groups you think we should contact and the name of an appropriate person, if known.

News Media

We have not yet openly advertised the existence of BCIA. Still, word does tend to get around, and I have already been contacted by a couple of reporters. David Clarke of Inside EPA is particularly interested in BCIA, and the next issue is likely to mention BCIA's formation. Another media contact, a free-lance writer, was doing an article on indoor ozone (produced by office equipment) for a magazine called The Office. In addition, I had lunch with the editor of Pesticide and Toxic Chemical News last week and she also is interested in what we are doing.

It seems appropriate for us to issue a press release in the near future, and a proposed version is attached. Please call Steve Risotto or me with your comments no later than December 6.

Paul A. Cammer, Ph.D.

Attachments

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