

Sparber
and
Associates, Inc.

1325 Pennsylvania Avenue, NW
Suite 500
Washington, DC 20004

(202) 393-3240

February 11, 1992

MEMORANDUM

TO: Karen Fernicola Suhr ✓
Kay Packett

FROM: Joanna Hamilton J

RE: February 10 BCIA Board Meeting

Yesterday's board meeting was well-attended, and, I think, productive. The most important item on the agenda was revision of ASHRAE standard 62-1989, and considerable time was spent working out BCIA's response to the new Tucker proposals. The board's decisions on this and other topics are summarized below:

I Attendance

Representatives of: Air Products, Dow, Eastman Chemical, HBI, Honeywell, the Meckler Group, and Union Carbide. Ned Hopper, of the Carpet and Rug Institute, attended as a guest.

II ASHRAE Standard 62-1989

The Board decided that BCIA's objections to the proposed overhaul of standard 62-1989 should take two tracks, one focusing on the substantive problems with the Tucker approach and the second focusing on the potential liability ASHRAE could incur by presuming to set health standards.

BCIA's substantive objections are primarily two: (1) That the Tucker approach could raise ventilation rates several-fold, even up to 120 cfm in some buildings. Meckler and Roberston felt that this increase in ventilation rates has been obscured by the fact that Tucker's ventilation rates were presented in liters/second, rather than cfm. (2) That Tucker's approach would likely complicate the standard beyond the point of utility for the building code organizations. The board decided that these problems need to be brought to the attention of the ASHRAE membership in a non-confrontational manner. Merely translating Ole Fanger's standard into CFM and circulating this information, either to individual members or through the ASHRAE journal, may

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be sufficient. The board decided that Cammer should bring these concerns to the attention of BOMA and other interested groups. Robertson believed that the Association of Energy Engineers would also have concerns, and said that he would present the issue to them.

The liability issue will be pursued separately, and relatively quietly. The board agreed to have Dickson prepare a memo outlining the possible liability that both ASHRAE and its individual members could incur by presuming to set health standards for the indoor environment. This will be presented to the ASHRAE staff in Atlanta, perhaps in person, and copied to Dick Charles. At very least, this will establish a record of objections should an appeal to the standard become necessary.

III Model State Legislation

On Cammer's recommendation, the board agreed that BCIA should take a step back from the Environmental Safety Council and its work to develop an IAQ model law. Cammer also reported on the possibility of a similar effort being started up by the American Lung Association and the Consumer Federation of America. There was some feeling on the board that pursuit of model state legislation runs counter to our goal of having an OSHA standard that would preempt state law, but there was also reluctance to abrogate any chance of having a voice in a process that would move forward with or without us. The Board decided that Cammer should continue to discuss the project with ALA and CFA and attempt to remain involved so long as their activities do not run counter to BCIA's interests.

cc: Mike Forscey

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