

Anti-MCS paper for use "on the Hill"

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MEMORANDUM

TO: Kay Thomas
FROM: Joanna Hamilton
RE: BCIA Board Meeting of January 16

The following is an outline of what occurred at yesterday's meeting.

I Attendance

Peter Binnie	HBI
Milton Meckler	The Meckler Group
Gray Robertson	HBI
Steve Risotto	BCIA
Michael Pearson	Union Carbide
Frank Gallo	Union Carbide
Margaret Rogers	Dow Chemical
Susan Hearn	Dow Chemical
Neil Hawkins	Dow Health and Environmental Sciences
Stewart Holm	BCIA
Steven Ludmerer	Union Carbide
Mark Finn	Amoco Corporation
Klaus Rosinski	Owens Corning Fiberglas
Dennis Heydanek	Dow Chemical
Paul Cammer	BCIA
Dick Herrett	ICI Americas
Bruce Dickson	Paul, Hastings, Janofsky and Walker

II Discussion by Bob Axelrad of EPA's Indoor Air Division

Axelrad spoke for about an hour, outlining his programs and taking questions from the Board (some of which Pete has already discussed with you). His most significant points were that:

- o His basic policy on mitigating indoor air problems hasn't changed: Reduction of source pollution first, augmented by ventilation to "dilute" the remaining pollutants, and air cleaning. BCIA has serious problems with characterizing ventilation as dilution of pollution and will seek to educate Axelrad on this point.
- o Although his personnel and operating budget for 1991 was approximately doubled over the FY90 appropriation, his research budget has remained static. This raised a few questions as to whether this meant that his office would be issuing more information based on less research. Axelrad commented that CIAR has the biggest research budget on this issue, but that he couldn't trust their findings on tobacco issues.
- o EPA plans to participate in the ASHRAE code revision process on 62-89.
- o He does not support the IAQ Act because he feels it will divert his resources to less productive activities and likely force him to issue health advisories, and possibly set action levels. Axelrad is opposed to EPA setting exposure limits at this time because there are only two possibilities -- PEL or zero. Guess which one he'd pick.
- o The Building Owners and Managers Guide is expected to be finished this Summer. BCIA Members were disturbed that NIOSH seems to be playing a very limited role in the development of the documents.
- o EPA will try to encourage (perhaps through grants) standardization of building assessments so that those assessments could collectively form a useful body of data.

III Pollution Prevention

There is some serious disagreement at BCIA, and even within some of the member companies (such as Dow) about the posture to take on "pollution prevention." Voluntary alteration of a product in the absence of any scientifically demonstrable need to do so seems to raise a vision of lambs being led to the slaughter in some people's minds.

Cammer argued persuasively that however ridiculous it may seem, it is the wave of the future at Federal agencies. Apparently CPSC is going that route with styrene in carpets.

IV OSHA

The Board agreed that BCIA should continue to work towards increasing OSHA's involvement in the indoor air issue. BCIA will encourage OSHA to issue an ANPR rather than simply a request for information on indoor air quality, and will encourage their setting of a ventilation standard as a way of addressing the issue without raising the blue vs. white collar question.

V Legislation

BCIA's official position on indoor air quality legislation will be that such legislation is not necessary, however if it must be then it should focus on research.

VI Technical Committee Meeting on Multiple Chemical Sensitivity

Participants agreed that "MCS" in itself was suggestive of cause and decided instead to refer to it as "environmental illness."

The meeting was mostly to draft a white paper on MCS for use on the Hill when staffers say "And what do you have to say to this?" The paper will point out that it is generally not recognized by doctors as a clinically definable affliction and that it needs to be studied much, much more.