State Building and Construction Trades Council
of California

ROBERT L. BALGENORTH
PRESIDENT

RICHARD ZAMPA
SECRETARY-TREASURER

Chartered by
BUILDING AND CONSTRUCTION TRADES DEPARTMENT
AFL - CIO

XC: Board Members 06-1-4
Chairman CEW 1/26/05
TJ MHS
KT Legal (AM/KO) SSD

State Building and Construction Trades Council

Comments Regarding "Proposed Identification of Environmental Tobacco Smoke as a Toxic Air Contaminant"

The State Building and Construction Trades Council agrees with the report of the Scientific Review Panel that environmental tobacco smoke is a toxic air contaminant.

In 1999, the State Building Trades Council established the BUILT program, which is funded by California's Tobacco Control Section (Dept. of Health Services). BUILT works with and through apprenticeship programs, unions, and union health and welfare funds across the state to provide education about the hazards of tobacco and to promote cessation of tobacco use. Since more than 30% of California construction workers smoke cigarettes, and at least half of construction workers work outdoors where they are not covered by Labor Code 6404.5, outdoor construction worksites are a primary source of environmental tobacco smoke exposure for our members.

This statement in the Executive Summary describes the situation for construction workers in California, *"The primary and often the only exposure for individuals who do not spend time near smokers is outdoors in locations over which the individual has little control. For non-smokers whose work or other activities bring them into contact with outdoor smokers regularly, 100% of their exposure can be attributable to proximity to outdoor smoking."*

Further, the combination of tobacco smoke with many of the toxic substances used in construction increase the potential hazards for our members significantly. The illnesses and death caused by these exposures rob the trades of skilled workers and increase health care costs for unions and employers. Since many of the toxic compounds found in environmental tobacco smoke are already on the list of toxic air contaminants it is logical that tobacco should be included on this list.

The State Building and Construction Trades Council thanks the ARB for your work on the report and we agree with your conclusions. We hope that listing ETS as a TAC will bring more protection to the workers who build California.

Sincerely,

Robert Balgenorth
President

RLB:tg
opeiu#29/afl-cio

RECEIVED
JAN 18 2006
AIR RESOURCES BOARD
CLERK OF THE BOARD

1225 - 8th Street, Suite 375 • Sacramento, CA 95814 • (916) 443-3302 • FAX (916) 443-8204

(5)