

August 19, 2004

Ms. Dorothy Shimer
Research Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Ab1173@listserv.arb.ca.gov

Subject: Comments on the "Indoor Air Pollution in California" dated June 2004

Dear Ms. Shimer:

As a practicing Certified Industrial Hygienist (CIH) and past president of the San Diego Local Section of the American Industrial Hygiene Association I would like to respectfully submit the following comments and recommendation regarding the Report to the California Legislature entitled "Indoor Air Pollution in California," dated June 2004.

Comments

- In order for a thorough evaluation of the report to be conducted and prepare comments of value, a deadline date later than August 20, 2004 is needed. I respectfully suggest an extension until September 17, 2004.
- The stated potential health effects of "major indoor pollutants" are based on the known effects of truly toxic levels of exposure. The potential health effects of the extremely low levels of these "indoor pollutants" are thereby magnified in the draft report.
- The report fails to address the dose-response relationship and the fact that a No Observable Effect Level (NOEL) exists for most chemicals. The mere fact that a chemical can be detected at very low levels should not necessarily lead to the conclusion that a health hazard exists.
- The statement that 'significant gains could be achieved in public health protection from reductions in indoor source emissions...' begs the question of what epidemiology has been done to demonstrate that 'significant gains' would be achieved. The referenced studies on asthma, for example, only find that limited, suggestive or sufficient evidence 'of an association' exist. That tenuous association in some cases does not appear to support the statement that significant gains could be achieved.

The characterization and dissemination of information pertaining to the quality of air and livability of the indoor environment for employees and homeowners is well worth serious scientific consideration. In light of some of the comments listed, I would support a thorough peer review by an independent scientific panel that includes Certified Industrial Hygienists, since we are the highly respected science-based professional practitioners of Indoor Air Quality evaluation and mitigation.

Sincerely,

Denise L. Daggett, MS, CIH
Past-President of the San Diego Local Section
of the American Industrial
Hygiene Association