

From: James Repace  
Sent: Monday, June 12, 2000 9:54 AM  
To: OHSR\_Reg@wcb.bc.ca; jboomer@hsf.bc.ca  
Subject: ETS Public Hearing

Policy & Regulation Development Bureau  
Workers' Compensation Board  
Box 5350 Station Terminal  
Vancouver, BC V6B 5L5

Via Email: <OHSR\_Reg@wcb.bc.ca>

Re: Public Hearing on ETS June 12, 2000.

Testimony of James Repace, Repace Associates, Inc.

The hospitality industry has asserted that a new and unproved ventilation technologies, such as displacement ventilation, can "control" environmental tobacco smoke. However, they are unable to quantify the ETS exposure or risk for hospitality industry workers or patrons for these technologies, either before or after the imposition of the new technology. Moreover, some current North American building codes do not even require that buildings be ventilated, and those that do require ventilation do not enforce it. There is also a lack of legally recognized standards for acceptable ETS exposure as well as the lack of information on typical exposure levels. However, indoor air quality standards for ETS have been proposed in the scientific literature, and reliable mathematical models exist for predicting pollutant concentrations from indoor smoking. These standards and models permit application of an indoor air quality procedure for determining ventilation rates as proposed in ASHRAE Standard 62. Using this procedure, it is clear that dilution ventilation, air cleaning, or displacement ventilation technology even under moderate smoking conditions cannot control ETS risk to de minimis levels for workers or patrons in hospitality venues (restaurants, bars, casinos, etc.) without massively impractical increases in ventilation. There is a scientific consensus that ETS is a known cause of cancers, cardiovascular diseases, and respiratory diseases. Moreover, ETS contains 5 regulated hazardous air pollutants, 47 hazardous wastes, and more than 100 chemical poisons. Smoking bans remain the only control measure to ensure that workers and patrons of the hospitality industry are protected from exposure to the toxic wastes from tobacco combustion.

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