



**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC WORKS
165 Capitol Avenue, Hartford, Connecticut 06106-1606**

JAMES T. FLEMING
Commissioner

**Testimony of the
Department of Public Works (DPW)
Concerning Senate Bill 1051
AAC the Inspection and Evaluation of Air Quality in State Buildings
February 15, 2007**

DPW presents the following testimony regarding proposed SB 1051:

While the agency supports the intent of this bill, DPW currently has similar policies and procedures in place in its owned and managed buildings to address the items outlined. DPW would require additional staff to conduct these types of inspections at the level and frequency that the bill apparently requires. The estimated costs of carrying out this bill are in the range of \$6 million every 5 years, based on DPW's current portfolio of 6 million square feet of managed space. This estimate does not include state owned space under custody and control of other state entities such as higher education (UConn, CSU, CTC), DCF, DOC, DOT and the Judicial and Legislative Branches. Nor does this figure include costs for expected bonding dollars for corrective measures that these inspections may create a demand for, regardless of actual necessity.

Furthermore, there is a lack of any accepted industry or regulatory standards for certain indoor air quality irritants such as mold, fungi, or other microbial agents where there are no established exposure limits. Just as with dust mites, pollen, and grass, and other allergens, individuals with allergies react to different concentrations. Where regulations and accepted industry standards exist, such as ASHRAE, OSHA, NIST, DPW requires all property managers to adhere to these standards.

DPW is actively implementing Governor Rell's Executive Order No. 14, requiring the use, in all its facilities, of cleaning products that minimize potential impacts to human health and the environment.

DPW's portfolio is managed by both in-house and property management firms. They have the primary responsibility to ensure the safe operation and maintenance of their assigned buildings and to minimize, among many things, any life safety and environmental issues that arise. DPW has established various protocols to be followed based on the type of building related issues that develop and are modified to meet any additional characteristics that may be unique to each building, the majority of which can be found in each building's tenant manual.

Each property manager has a developed a detailed maintenance schedule for all aspects of the building, such as HVAC, cleaning, fire and life safety systems, energy management systems, mechanical, electrical and plumbing. These maintenance schedules are submitted monthly to DPW as part of their monthly property reports.

The property managers also conduct tenant meetings, handle work orders submitted by tenant agencies and act on behalf of DPW with the tenant agency liaisons. DPW, along with the property manager and our client agencies, has developed reporting and communication procedures with the intent of being alerted to building related issues as soon as they arise, whether it's a burned out light bulb or a burst sprinkler head.

DPW requires the property managers to submit updated capital improvement requests, and to review them every three months. These requests are then incorporated into DPW's biennial Capital Improvement Request list used for budgetary purposes and to prioritize items for submittal for requested bonding. Life safety and environmental related capital improvement requests are categorized by DPW as the highest priority. Depending on the cost, these items are addressed in priority order as funding is made available via bonding or a building's operating budget.

DPW has an Environmental Health and Safety Unit charged specifically with ensuring compliance with air, water, and waste related issues as well as other environmental compliance issues as directed by US EPA, DEP, DOL, DPH, OSHA and other agencies. The Unit is proactive in recommending preventative maintenance and operational guidelines for building components that may affect environmental or safety compliance. To assist our property managers in complying with regulations, annual audits are performed to evaluate our programs. In addition, the Unit assists property management staff in identifying resource requirements for environmental or safety projects required to comply with regulations or current industry guidelines, such as underground tank upgrades, water discharge permitting, ventilation system upgrades, and mold-prevention measures. When problems with indoor air quality occur, the Unit promptly responds to complaints.

This Unit, comprised of only three individuals, is becoming a more and more critical component of DPW, as more attention is given to indoor environmental quality. It is a large task for a unit responsible for indoor air quality and environmental compliance for almost 10 million square feet of owned and leased space.

The best way to prevent the occurrence of any potential indoor environmental quality problems that may be identified as a result of carrying out inspections and evaluations every 5 years, as recommended by this bill, would be to instead use these estimated dollars to allow for additional staff and more preventative maintenance of our state owned buildings.

Thank you for taking DPW's comments into consideration. Attached is a sampling of some of the guidelines and standards we follow, as well as other documents we use for the proper operation and maintenance of our DPW facilities. DPW is available at your request, should there be any questions or need for additional information.

Examples of Guidelines used for DPW Managed Facilities

Our buildings HVAC systems are inspected and evaluated based upon

ASHRAE Standard 62-1-2004
(Ventilation for Acceptable Indoor Air Quality)

ASHRAE Guideline 12-2000
Minimizing the Risk of Legionellosis Associated with Building water Systems

ASHRAE Standard 55-1992
Thermal Environmental Conditions for Building Occupancy

EPA's Indoor Air Quality program

To prevent potential IAQ issues related to flooding or water infiltration, our property managers are directed to adhere to procedures based upon several well known authorities such as the

Institute of Inspection, Cleaning and Restoration (IICRC) and their standards

IICRC S500
Standard and Reference Guides for Professional Water Damage Restoration

IICRC S520
Guide for Professional Mold Remediation

New York City Guidelines for Mold Abatement

High efficiency filter vacuums, chair and cloth partition cleaning and carpet cleaning in accordance with

IICRC S001
Carpet Cleaning

DEP Integrated Pest Management programs

Pesticide use at any of DPW buildings is nearly non-existent as are in place at all properties. Only DEP licensed companies are used.