

Dragon, Karen E. (CDC/NIOSH/EID)

From: Philip Morey [PMorey@environcorp.com]
Sent: Monday, July 11, 2011 4:05 PM
To: NIOSH Docket Office (CDC)
Subject: 238 - NIOSH Indoor Environmental Quality (IEQ) Alert

Dear Sirs,

My comments are brief as I only found out about the document last Friday (July 8, 2011). Also I will focus only on HVAC-related issues. In general the document is excellent and my suggestions involve thinking about above the minimum ASHRAE recommendations. For example it is mentioned on page 13 that a MERV 6 filter is the minimum requirement. While this is true it should be realized that a MERV 6 filter is next to useless with regard to keeping dust out of the HVAC. So a MERV 6 is equivalent to an academic C- in college. How about making a B or an A level recommendation in a checklist format. If you want a B level HVAC design install MERV 9 filtration. If you really want to have a dust free HVAC use MERV 12-14 filtration. There is considerable good information on filtration in Strategy 7.5 in the 2009 ASHRAE IAQ guide (your reference ASHRAE 2009b).

There are other similar areas for document improvement such as found in ASHRAE 2009b Strategies 4.1 (dirt and moisture in HVAC) and 4.3 (access for maintenance). After doing IAQ work for 30 plus years I keep seeing the same mistakes like in poor design for HVAC access both in residential and commercial systems. Air handling units are placed in attics , in crawl spaces, or in mechanical equipment rooms where it is difficult to access and maintain system components. This is your C- system. So my recommendation is to review Strategy 4.3 and come up with a B and A checklists (get rid of the old EPA check list) that will really enhance the cleanliness and operation of HVAC systems. Whatever happened to UVGI? This is a big topic at ASHRAE meetings. Shouldn't this be discussed?

In summary develop checklist recommendations that can really improve IAQ over the minimum recommendations.

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