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MEMORANDUM

TO: Don Arbuckle
Deputy Administrator
Office of Management and Budget, Office of Information and Regulatory Affairs

FROM: Carpet and Rug Institute

DATE: March 20, 2001

RE: Carpet and Indoor Air Quality

Through the course of investigating published reports regarding carpet, it is apparent to the Carpet and Rug Institute (CRI) that there is a wide array of misperceptions pertaining to the role of carpet in indoor air quality. Numerous federal government websites are available to the public that spread this information. As a result, these inaccurate and outdated types of information are being adopted by state agencies in procurement strategies, as well as having negative impacts on the public's perceptions of carpet as a floor covering choice.

The critical issue is the quality, integrity and objectivity of data posted by federal government agencies. The Carpet and Rug Institute is concerned about the standards, or lack thereof, for posting data on government websites.

Pursuant to the new Data Quality law recently signed by President Clinton (Public Law 106-554), CRI is aware that the Office of Management and Budget (OMB) is currently in the process of developing standards for information which is disseminated by federal government agencies. The guidelines that OMB develops for Data Quality must define four key terms: quality, objectivity, utility, and integrity. As part of this process, a petition mechanism will also be developed, allowing the public the ability to petition federal agencies in order to correct information that does not comply with OMB guidelines. These new standards and guidelines must be completed no later than September 30, 2001. Within one year of the OMB guidelines for Data Quality, federal agencies must issue their own guidelines that conform to those of OMB. CRI would like to make you aware of some "real world" examples that we hope the guidelines will address.

A number of federal websites are posting information which seems to be designed, perhaps intentionally, to lead the public to believe that there are health issues associated with carpet that warrants their due consideration. It is particularly disconcerting when agencies that do not have primary authority on regulatory or health and environmental matters make health and environmental claims that are far more provocative even than statements made by the agency with such authority. For example, the EPA, which has primary jurisdiction for indoor air quality matters, has posted on its



website that there has been no scientific evidence to make a connection between carpet installation and impacts on health: “[s]cientists have not been able to determine whether the chemicals emitted by new carpets are responsible” for health effects. (www.epa.gov/iedweb00/pubs/insidest.html#Carpet). Yet despite this statement of fact, many other federal websites post information that is not factual. We have listed below some of the federal sites that provide examples of the problem with poor data quality.

FEMP

The Department of Energy’s Federal Energy Management Program’s (FEMP) Greening Federal Facilities, Section 7.1 Indoor Air Quality, states that “carpeting, especially carpet backings and adhesives” are a common source of volatile organic compounds (VOCs) and indoor air quality (IAQ) problems (<http://gils.doe.gov:1782/cgi-bin/w3vdkhgw?qryANDn5i6:doecrawl-022144>). Also in this section, FEMP recommends that wall-to-wall carpeting be minimized and that carpet adhesives be eliminated. This recommendation stems from FEMP’s identification of VOCs, fungus, and bacteria as a problem for carpet and thus IAQ. The FEMP site goes on to list various health impacts that result from these contaminants, including irritation of skin, eyes, nose and throat, headache, blurred vision, fatigue, nausea, even cancer and possible birth defects. Carpet is not listed as the only source of VOCs that can lead to such severe health impacts, but is directly tied to these health effects by the FEMP site. There is no discussion of the level of VOCs that trigger such symptoms, which is crucial information that must be provided to actually inform, rather than unjustly alarm the public.

Department of Education

The National Clearinghouse for Educational Facilities, an affiliate of the Educational Resources Information Center of the U.S. Department of Education, provides false information regarding formaldehyde in carpet. Formaldehyde has not been used in the manufacturing of carpet in well over 10 years. The Clearinghouse writes that formaldehyde is present in such materials as “upholstery, drapes, carpets, and paper products.” The site also goes on to discuss health risks due to VOCs such as irritation of eyes, throat and skin, central nervous system damage, liver, kidney and heart problems, and trouble breathing. As was stated above for similar claims made on the FEMP website, the VOC levels necessary to produce such side effects must clearly be provided (<http://edfacilities.org/ir/ncefpubs/airquality3.html>).

U.S. EPA

The Environmental Protection Agency also lists recommendations to schools pertaining to indoor air quality issues. One of the listed recommendations is reducing use of products such as adhesives. Many adhesives made today contain very low levels of VOCs with little or no side effects when used according to instructions. While EPA’s adhesive recommendation is not explicitly false, it is misleading to the public and clarification is needed. (www.epa.gov/iaq/schools/scfaqs.html#FAQ#5).

The EPA site discusses carpet materials becoming “sinks for deleterious substances which may be released much later, or act as collectors of contaminants that may promote subsequent bacterial growth.” (<http://notes.erg.com/eppstand2.nsf/Pages/DisplayProducts.html?Open&carpet>). This too is misleading, as it encourages the public to believe that removing carpet would remove these contaminants. The facts are that all floor coverings must be properly maintained to remove contaminants that enter the indoor environment.

CRI believes that highlighting federal websites where data quality needs to be improved will assist the OMB as it begins its work on this issue. If you need to contact CRI for assistance to ensure data quality please contact Gary Kenworthy at (706) 278-9261.