May 20, 2022

Senator Maria Cantwell (Washington)
Chair
Senate Committee on Commerce, Science, and Transportation
United States Senate

Senator Roger Wicker (Mississippi)
Ranking Member
Senate Committee on Commerce, Science, and Transportation
United States Senate

Senator Kyrsten Sinema (Arizona)
Chair
Subcommittee on Aviation Safety, Operations, and Innovation
Senate Committee on Commerce, Science, and Transportation
United States Senate

Senator Ted Cruz (Texas)
Ranking Member
Subcommittee on Aviation Safety, Operations, and Innovation
Senate Committee on Commerce, Science, and Transportation
United States Senate

AIHA Support and Recommendations for S.3944 Cabin Air Safety Act of 2022

Dear Senators Cantwell, Wicker, Sinema, and Cruz:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety (OEHS), strongly encourages you to swiftly pass the Cabin Air Safety Act of 2022 (S.3944). This bipartisan bill would help protect airline passengers and crew members from exposure to potentially harmful air in commercial aircraft by requiring flight attendants, pilots, maintenance technicians and related personnel to receive annual training on how to identify and respond to incidents involving gases, smoke, or fumes onboard aircraft. The bill would also require air carriers to install and operate onboard air monitoring equipment to identify the source(s) of onboard air contamination in real time.

AIHA believes that ventilation on aircraft is paramount, and we support installing general air quality monitoring equipment on aircraft. For example, ozone detectors can enable trained flight crew to determine possible unhealthy exposures during a flight and can enable trained aircraft maintenance personnel to troubleshoot airborne contaminant issues. Airborne exposure data will help research personnel
such as Certified Industrial Hygienists (CIHs)\(^1\) document possible crew exposures for analyzing chronic health effects. These detectors can alert the crew to possibly dangerous concentrations of ozone, for example, and other general cabin air quality issues that may have chronic or acute health effects.

AIHA believes that aircraft manufacturers should develop procedures that can inform the crew on how to respond to alarms indicating harmful levels of in-cabin contaminants. We believe that the FAA should be authorized to incorporate by reference standards for aircraft cabin air quality following the exposure limits published by entities such as the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs\(^2\)), National Institute for Occupational Safety and Health (NIOSH) Recommended Exposure Limits (RELs), AIHA’s Workplace Environmental Exposure Limits (WEELs\(^3\)), or ASHRAE standards. The FAA should require these episodic events to be reported on a public website, so that researchers and airline crew can review this data. With training requirements for flight attendants and aircraft maintenance personnel, pilots can identify any issues with monitoring equipment which can be checked and possibly certified by experienced air sampling professionals with specific knowledge on identifying toxic smoke and gases possibly present in the air of airline cabins. The training materials should also include education on general air sampling equipment maintenance, calibration, and the sources and types of cabin airborne contaminants including training on possible airborne biological agents, how to recognize symptoms of possible overexposure, how to report incidents, and how to receive other pertinent information for substance-specific hazard communication.

Additionally, AIHA recommends that aircraft be provided with affixed or handheld calibrated air sampling equipment.

**Conclusion and next steps**

The Cabin Air Safety Act is currently supported by several stakeholder organizations, including the Air Line Pilots Association International, Association of Flight Attendants, Allied Pilots Association, Association of Professional Flight Attendants, National Consumers League, International Association of Machinists and Aerospace Workers, Transport Workers Union of America, American Association for Justice, American Lung Association, International Union of Teamsters, and Southwest Airlines Pilots’ Association.\(^4\)

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\(^1\) For additional information on the CIH professional credential, please visit [https://gobgc.org/cih/](https://gobgc.org/cih/)


\(^3\) [https://www.aiha.org/get-involved/aiha-guideline-foundation/weels](https://www.aiha.org/get-involved/aiha-guideline-foundation/weels)

AIHA strongly encourages you to swiftly pass the Cabin Air Safety Act of 2022, as it will help improve the air quality onboard aircraft, improving the health, safety, and overall experience of crew and passengers. If you have any questions about AIHA’s support for this bill or other matters, please contact me at mames@aiha.org or (703) 846-0730.

Sincerely,

Mark Ames
Director, Government Relations
AIHA

About AIHA
AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA’s nearly 8,500 members are Certified Industrial Hygienists, and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.

Cc:
Senator Richard Blumenthal (Connecticut)
Senator Edward J. Markey (Massachusetts)
Senator Dianne Feinstein (California)