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To: Amy Cole-Ives  
From: Maine Indoor Air Quality Council  
Re: Comments to Building Codes Draft Proposal

The Maine Indoor Air Quality Council offers the following comments to the Building Codes Resolve 46 Draft Proposal (December 20, 2007 version):

**1) Require residential construction to undergo an equal level of scrutiny as public and commercial buildings.**

Re: “Additionally, the Resolve 46 Committee recommends that plan review and inspection for residential buildings should continue to be done on a voluntary basis by municipalities.”

In 2006 the MIAQC served as the administrator of the legislatively-mandated Mold in Maine Buildings Task Force (Resolves 2006 Chapter 174). The participants in this task force concluded that in spite of a lack of a uniform state building code, commercial and public buildings had a significant amount of professional oversight. Existing licensing and professional requirements for the design and construction of public and commercial buildings has played a significant role in insuring that many of these buildings are constructed and rehabilitated in accordance with acceptable building practice principles.

A similar licensing and professional landscape for residential construction and renovation is conspicuously lacking in Maine

*The MIAQC therefore recommends that the Building Codes Draft Proposal include a strategy that insures that residential properties undergo an equal level of scrutiny as public and commercial buildings.*

**2) Include the codified ASHRAE standards as part of the process to adopt, amend and update codes.**

The chart identifying state and local responsibilities for plan review includes adopting, amending and updating codes. Specifically referenced are the IRC, the IBC, the IEBC, and the IECC.

State statutes and the model building codes contain significant references to several of the ASHRAE (American Society of Heating, Refrigeration, and Air conditioning Engineers) ventilation and energy standards. Specifically referenced are the ventilation standards—ASHRAE 62.1 for commercial

buildings and ASHRAE 62.2 for residential buildings—and ASHRAE 90.1, the energy standard for commercial buildings.

*The MIAQC recommends that these codified ASHRAE standards be referenced as part of the process to adopt, amend, and update the codes.*

Additional note: In 2007, the Maine Indoor Air Quality Council in partnership with the American Lung Association of Maine and the Maine Centers for Disease Control & Prevention, worked to have the ASTM E1465-2006 Standard: Standard Practice for Radon Control Options for the Design and Construction of New Low-Rise Residential Buildings included in state as a state model radon resistant construction standard. This is not likely to need updating as part of phase I, but should be included in any future code review and updating.

**3) Include (1) Mechanical Engineer and (1) Representative of the local chapter of ASHRAE on the Technical Building Codes Board, and take advantage of the resources available through local professional organizations when seeking candidates to serve on the Technical Building Codes Board.**

While the proposed membership of the Technical Building Codes Board provides adequate coverage of the structural aspects of construction, it lacks any representatives qualified to design and construct critical mechanical systems.

*The MIAQC therefore recommends the Technical Building Codes Board include a licensed mechanical engineer as well as a representative of the local chapter of ASHRAE to insure adequate coverage of mechanical systems issues and concerns.*

*Additional note: Maine is fortunate to have a broad variety of groups with significant expertise in design and construction issues and concerns. The MIAQC further recommends that the following groups and organizations be consulted for recommendations for representatives to serve on the Technical Building Codes Board: Maine chapter of ASHRAE, Maine chapter of AIA, Maine Home Builders & Remodelers Association, the Mid-Coast Builders Alliance, the Maine Indoor Air Quality Council, and the Maine chapter of the U.S. Green Buildings Council.*