



Shaping Tomorrow's
Built Environment Today

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2020-2021 ASHRAE President

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June 23, 2021

Ms. Terry Glebocki
President
Casino Association of New Jersey
One Borgata Way
Atlantic City, NJ 08401-1946

Dear Ms. Glebocki:

I am writing on behalf of ASHRAE regarding potential changes to the indoor air policies at casinos and similar establishments in New Jersey. We know that during the COVID-19 pandemic, commercial casinos were required to operate as smoke-free spaces when reopening. Many casinos have also upgraded their filtration systems during the pandemic. We appreciate these actions taken by casino owners, operators and managers to improve indoor air quality, and we encourage continued adequate ventilation and filtration. However, we are concerned about the potential return of indoor smoking to these establishments, which could undermine the benefits of the recent ventilation and filtration upgrades.

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 50,000 members worldwide focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today. In response to the COVID-19 pandemic, ASHRAE's Epidemic Task Force has developed guidance for multiple building types and operational conditions, including commercial buildings and building reopening. Links to this guidance and other resources can be found on our COVID-19 page [here](#).

ASHRAE's Position Document on Environmental Tobacco Smoke (ETS), updated in July 2020, states that with regard to indoor environments with mixed occupancy of smokers and nonsmokers, "If smoking is allowed throughout a space or a collection of spaces served by a single air handler, with no effort to isolate or separate the smokers and nonsmokers, **there is no currently available or reasonably anticipated ventilation or air cleaning system that can adequately control or significantly reduce the health risks of ETS to an acceptable level.** This situation includes unrestricted smoking in homes, dormitories, casinos, bingo parlors, small workplaces, and open plan office spaces." (*ASHRAE Position Document on Environmental Tobacco Smoke, p. 9.*)

As a technical Society developing standards for indoor environmental quality, **ASHRAE holds the position that the only means of avoiding health effects and eliminating indoor ETS exposure is to ban all smoking activity inside and near buildings.** This position is supported by the conclusions of health authorities that any level of ETS exposure leads to adverse health effects, and therefore:

- The building and its systems can reduce only odor and discomfort but cannot eliminate exposure when smoking is allowed inside or near a building.
- Even when all practical means of separation and isolation of smoking areas are employed, adverse health effects from exposure in non-smoking spaces in the same building cannot be eliminated.
- Neither dilution ventilation, air distribution (e.g., “air curtains”) nor air cleaning should be relied upon to control ETS exposure.
- For multifamily buildings, complete smoking bans inside and near them protects nonsmoking adults and children.
- Further research is needed from cognizant health authorities on the health effects of involuntary exposure in the indoor environment from smoking cannabis, using hookahs, using electronic nicotine delivery systems (ENDS), and engaging in other activities commonly referred to as vaping or using e-cigarettes.

I am attaching a copy of the ASHRAE Position Document on Environmental Tobacco Smoke, which more thoroughly discusses this matter. ASHRAE would be happy to address any questions you might have or to offer technical assistance and/or experts from relevant technical committees within ASHRAE. Please feel free to contact me or have your staff contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in black ink that reads "Charles E. Gullledge III, P.E." The signature is written in a cursive, slightly slanted style.

Charles E. Gullledge III, P.E., FASHRAE, HBDP, LEED AP
2020-2021 ASHRAE President

Enclosure