



HUNTER COLLEGE

City University of New York
School of Health Sciences
425 East 25th Street, New York, NY 10010

Environmental and Occupational Health Sciences
(212) 481-7569

April 29th, 2008

Public Safety Committee
The City Council of New York
New York, NY 10170

Dear Council Members:

I am writing again today to express my opinion on the proposed regulation referred to as “Intro 650 Atmospheric Detectors”. This is my second public testimony. Let me begin by thanking the council for accommodating the academic and research issues I first presented in my January 8th testimony. However, I still believe this measure to be unnecessarily restrictive and having no public safety value. My testimony today will focus on the intent of the proposed regulations. For more specific details affecting the profession, I direct the council to my January 8th testimony.

As background, I am a tenured Associate Professor and director of the Environmental and Occupational Health (EOHS) program at Hunter College and have over 30 years academic experience. Our program has been teaching and training professionals in the identification, evaluation and control of environment and industrial health hazards since 1978 and has graduated over 600 students. Both our degrees (MS and MPH) are accredited by the respective councils and the program has been funded by the National Institute for Occupational Safety and Health for over 30 years. Our alumni, conduct environmental health assessments and industrial hygiene surveys throughout the US and abroad. In short, my students are the experts that use the airborne chemical, biological and radiological detectors that are addressed in this proposed bill. On a personal note, I am a born and raised New Yorker having lived in Washington Heights, Astoria, Flushing and now at Tudor City in the Borough of Manhattan.

The importance and obligation of the council in protecting the citizens of New York City is historic and indisputable. Numerous initiatives generated by this body have made NYC one of the safest and healthiest places to live; be it crime, disease eradication or cleaner streets. When problems affecting the citizens of New York are discovered, the Council and its members act and act quickly. In this context, I ask the simple question, what triggered this regulation? What event or serious of events have brought the council to a point where we need such a far reaching law with many adverse implications. What problem are we trying to fix and at what cost?

Essentially and with all due respect, the “Legislative Purpose” of this proposed law is flawed. Neither the Council, the Mayor’s Office nor any City Agency (DEP, FDNY not NYPD) have provided evidence that un-permitted “atmospheric detectors” are putting the citizens of New York City in jeopardy. We have not had “toxic gas” false alarms causing massive disturbance in New York City and it is my belief that this is unlikely in our current operating environment. Be

aware that thousands of these detectors have been “deployed” and in operation for many years. Gas and radiological alarms go off daily and get investigated; yet no panic ensues because the profession installing and operating these detectors is cognizant of the data interpretation and operating limitations; meaning they know how to interpret the results and not jump to conclusions

Finally permitting these instruments will cause serious logistical problems in our profession; and I fear will actually limit air sampling. This adverse side effect would be a great hindrance to New York City and its citizens. Therefore I respectfully ask that this proposed regulation be rejected in its present form.

Sincerely:

A handwritten signature in cursive script that reads "Jack Caravanos". The signature is written in black ink on a white background.

Associate Professor of Environmental Health and
Acting Program Director of Urban Public Health and
Track Coordinator; EOHS MS and MPH degree programs