



August 21, 2009

Marc Cooley
Sacramento Metropolitan AQMD
777 12th Street, 3rd Floor
Sacramento, CA 95814

Re; Duraflame, Inc. comments regarding proposed revisions the District Rule 421

Duraflame, Inc is a leading producer of clean burning manufactured firelogs, which are petroleum-free and made from all renewable materials. We are eager to partner with the Air District in its efforts to reduce PM 2.5 emissions to improve Air Quality in the Sacramento Metro region.

We support revision of the current Rule 421 wood burning curtailment programs. We believe the District can make the program simpler to understand and easier to comply with by modifying the program to one threshold level for no burn days at which all solid fuel burning is prohibited. We also recommend the District abandon its voluntary no burn program, as the levels of proposed restriction are far below what is necessary to be protective of air quality.

The San Joaquin Valley Air District has demonstrated that a simplified program with one threshold for no burn days is easy to communicate and an effective method to reduce emissions from wood burning on bad air days. Eliminating the voluntary program also improves the simplicity of communicating the program to the public. You simply have bad air quality days when burning solid fuel is not allowed, and on every other day residents are free to burn. But, on those days when it is acceptable to burn the District should encourage the public to burn cleanly by using only cleaner burning appliances or fuels such as manufactured firelogs to further reduce emissions on non restricted days.

We do have concerns about the emissions threshold level the district has proposed for the one stage mandatory curtailment and recommend the level be set at the Federal 24 hour standard for PM 2.5 emissions violations. We also do not support the District's proposal to implement a contingency measure that would automatically reduce the emissions threshold for no burn days in 2015. Please find below our proposed revisions to Rule 421;

301.2 Revise the trigger for Mandatory curtailments to $35\mu\text{g}/\text{m}^3$ from the lower $30\mu\text{g}/\text{m}^3$ proposed by the district staff.

- The federal standard for 24 hour PM 2.5 violations is $35\mu\text{g}/\text{m}^3$.
- Setting a lower threshold will unnecessarily increase the number of unpopular no burn days in the district, and could reduce compliance by residences.

Duraflame, Inc.
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- There is no regulatory compliance justification for a lower air quality threshold for mandatory episodic curtailments.
- Even though staff claims they need a lower threshold to address forecasting inaccuracies, the Sonoma Technology Study of the current rule thresholds showed a greater reduction of emissions by 23% at 40 $\mu\text{g}/\text{m}^3$ Stage 2 threshold than the improvement at the lower threshold for stage 1 of 35 $\mu\text{g}/\text{m}^3$, meaning the significant improvement in emissions reductions was related more to the restriction of all wood burning than calling a restriction at a lower threshold level. It is therefore unlikely that any measurable gain will be evidenced by moving the threshold for mandatory curtailments to below the federal standard of 35 $\mu\text{g}/\text{m}^3$.

302 Delete the section titled Voluntary Curtailment.

- Emission levels of 20-25 $\mu\text{g}/\text{m}^3$ are thresholds which are considered to be good air quality days. It is unnecessary to suggest a restriction of wood burning on good air days.
- On Acceptable to burn days the District should promote cleaner burning appliances and solid fuels like manufactured firelogs to encourage residents to improve emissions for solid fuel burning on acceptable to burn days.

301.3, 301.4, 302.2

Delete the proposed contingency provision to automatically reduce the trigger for mandatory curtailments to a level of 20 $\mu\text{g}/\text{m}^3$ should the district fail to attain Federal PM 2.5 emission standards by 2015.

- Rule 417 adopted in 2006 capped the growth of wood burning emissions by prohibiting the installation of new wood burning fireplaces and stoves in new residential homes in the District. Emissions from wood burning therefore cannot grow as an emission source, yet other population driven sources of PM 2.5 emissions will continue to grow.
- According to the District Study by Sonoma Technology Inc adoption of Rule 421 in 2008 has already reduced violations of Federal health standards for PM 2.5 emissions by 40%. The District's further revision to rule 421 will certainly produce greater emissions reduction from wood burning.
- If the district fails to meet EPA standards by 2015 it won't be due to growth in emissions from wood burning. Rather it will be due to the District's failure to cut other significant sources of PM2.5 emissions.
- It is patently unfair at this time to require an automatic reduction in the threshold for restricting wood burning emissions in the next 5 – 10 years when it's very likely that other emission sources will be larger contributors at that time and should be the focus of future emission regulations.
- The district should review the contribution of all emission sources again in 2015 and then determine whether to implement further restrictions of wood burning at that time.

Public Education Programs - We encourage the District Staff to classify all non curtailment days as "Burn Cleanly" days in order to clearly communicate there will be days when burning is acceptable.

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- Continue to educate residents of the need to use the least emitting options on those days when burning is allowed.
- Recognize manufactured firelogs as a cleaner burning option for fireplaces on "Burn Cleanly" days. Manufactured firelogs produce dramatic emission reductions of 60-80% vs. burning wood for a typical evening fire, and conform to the District's stated objective of embracing new technologies as a method to reduce emissions.
- Promoting manufactured firelogs has been an effective strategy for reducing wood burning emissions on non-restricted days and is actively promoted by the San Joaquin Valley Air District, as well as all major metro air districts in Oregon and Washington states.

We appreciate your consideration of our concerns and proposed modifications to the current draft of proposed revisions to rule 421.

Respectfully submitted by,



Chris Caron
Vice President, Brand Development

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Marc Cooley

From: Sharon Lynes [sgelkgrove@yahoo.com]
Sent: Saturday, August 22, 2009 9:02 AM
To: County Supervisor; County Supervisor; County Supervisor; County Supervisor; County Supervisors; Marc Cooley
Subject: Further Restrictions on Clean Wood-burning Stoves

Sacramento Metropolitan Air Quality Management District:

Since the current rule in effect concerning burning in clean burning wood stoves is working and the air district has a good compliance rate, I strongly encourage you to leave the remaining Rule 421 in effect. To help improve the quality of air in the Sacramento Region, we converted from an older free-standing fireplace insert to a new, efficiently-burning free-standing insert at a cost of over \$1700 plus \$1000 for installation. What is so terribly wrong with the system as it currently exists?

Before you vote,

Please consider the fact that this new proposal is just more government regulation.

Please consider the fact that many jobs and family incomes are reliant on the wood-cutting/firewood industry, the wood stove stores, the installers, the companies that make wood stoves. In the last several years most of the wood stove stores in the area have closed.

Please consider the fact that in 2 hours the air pollution from the Bay Area ends up in the Sacramento area.

Please consider the fact that diesel exhaust from trucks, busses, and autos with diesel engines have no regulations such as Smog II on gasoline engines in autos in the Sacramento Area.

Please consider the fact that in the late fall and winter when the dew point is reached in the evening, any particulate matter in the atmosphere acts as nuclei for the dew, thus helping to clean the air nightly.

Please consider the fact that not that many households currently burn firewood for heating.

Please consider the fact that plants use CO2 for growth and give off O2. If you are concerned about air pollution, possibly the board could curtail development instead and encourage less urban sprawl and more agriculture.

I would encourage the SMAQMD to divert their energy to attacking the air pollution sources that are with us the entire year, not just for 4 months in the late fall and winter. Possibly regulate DIESEL ENGINES, AIR POLLUTION FROM THE BAY AREA, DEVELOPMENT (more exhaust), SMOKING (including cigars), BARBECUES, ETC.

Also, what is the SMAQMD doing about NO3 pollution and smog in the summer in the areas around Folsom and Roseville? Would you have no one drive a vehicle on bad days? Obviously not, but you can see the parallel.

8/24/2009

I am requesting of you as a board to use common sense in your approach and keep Rule 421 as it stands and encourage compliance for everyone's sake. Thank you

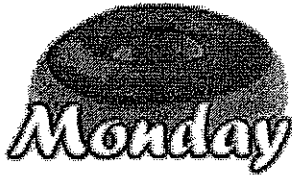
Respectfully submitted,

Grant Lynes

P.S. I was out of state during the July workshops, hence this letter.

Marc Cooley

From: lp [lpinney@surewest.net]
Sent: Monday, August 24, 2009 6:37 PM
To: Marc Cooley
Subject: Public hearing



Mr. Cooley.....

Boy how inconvenient is that ,.... 9:30 A.M. On a Thursday You guys really ought to re-think your schedules if you want people to actually show up and voice their opinions.... I work..... I loathe downtown..... Parking is the biggest deterrent to any downtown function or business that has ever been invented by city fathers... At least have it after the dinner hours so that parking is not an issue....

Enough of that issue..

I was vocal at the the last meeting at the community center on Gibbons Dr. In Carmichael which was entirely the wrong room for this venue. The largest issue for me and, I believe anyone with an older wood burning insert, is that you are not offering us an alternative to our investment..... If you want to limit us in any way then you need to offer us something like a catalytic converter (or whatever new technology there might be today) so that we don't have to start all over again and throw away the money that we have invested.....this must be done at the programs expense. Perhaps this would be better than you wasting more money on in-effective programs. You will find a tremendous amount of opposition to you plan regardless of the mandated numbers that you are trying to achieve.. It seems that my voice is falling on deaf ears. As this seems to never be championed as a viable alternative.... Give us an alternative or face the opposition !

8/25/2009

I hope I am able to make the next meeting

Sincerely

Larry Pinney

Marc Cooley

From: Lazi1518@aol.com
Sent: Sunday, August 30, 2009 9:03 AM
To: Marc Cooley
Subject: wood burning

We heat our small house with wood. We keep our bedroom doors closed and heat only our living room and kitchen. We saved up and bought a certified insert so we could burn on more days than we had previously been able to burn, My husband and I live on a fixed income and cannot afford high PGE heating costs. We have the gas heat turned down low and wear heavy clothes on days when we cannot burn because of bad air days. Please do not make it even harder for us to stay warm by increasing the number of days when we can't burn.

*Zina Powning
5617 Rapid Court
Sacramento, Ca 95841*

8/31/2009

Sacramento Metropolitan AQMD Board of Directors
Attn: Marc Cooley
777 12th Street, 3rd
Sacramento, Ca. 95814

August 24, 2009

AUG 26 2009

Re: Tougher air quality regulations is needed.

Subject: I'm in support of tougher air regulations and less burning and more no burn days in our County.

Please read this letter as part of the 9/24/09 Board of Directors SMAQA meeting. Thank you.

I'm in support of tougher air pollution regulations and less burning of any type and increase the no burn days in Sacto County. There is a need for tougher air quality regulations. Because I am an multi-chronic allergy diagnosed person by certified allergists with allergy Chronic Rhinitis, Asthmatic bronchitis sufferer. Have suffered the disabling effects of bad air days in both summer and winter. Three generations of my family have been medically diagnosed with allergies affected by bad air in summer and burning air smoke particularly in winter. Since my father's father has been living in Folsom since the gold rush. We have seen and smelled how the blue skies and breathable weather has changed for the worse. Last Friday the yellowish beige hazy, smoggy sky and the intense summer less ozoned air seem very surreal like out of a movie. "Yucky" weather!

The business who use to repair my car (an 1977 Chevy Concours with low exhaust emission) died in 2006. It went to Car heaven and I donated it to the Jesuit High School. The motor shut so quiet and it had pass the smog test required by D.M.V. as the Jesuit brother drove it away. The Car maintenance owner said in the 14 3/4 years he had repaired my car he had seen my breathing health decline asthmatically as I also have C.O.P.D. - He too has seen Folsom's air quality spirally plummeted to the worse since opened up his business in 1960's. I use to walk from my house to pick-up my car after it was maintenance. It because I can no longer do this long distance walking, I can walk 1 mile (round trip) now. Also for past 3 1/2 years have worn an earloop paper mask one purchases from a pharmacy whenever I go outside all year round. Particulary in summer and winter because of wood, pellet and other wood device working either in fireplace, stove or open pit type ^{device} burning.

as I go about my business, errands and exercising or recreationally about.

Someday I hope when you evaluate the Folsom air quality seasonal because it's one of the worse in Sacto County. With burning you include planes that fly over our cities such as jets: Cargo jets from Mather Field Cargo base, International airport, private jets, and from Mather Air Shows and McClellan Field Air museum; Propeller: from Mather Field Cargo and Vintage air shows to giving rides in vintage War planes (W.W. 2, Korean War & Vietnam era), privately own planes flown out of Auburn airport, Lincoln airport, Rancho Miriel airport, particular Cameron Park where home owners own planes and park them in their garages and take down the roadway and training pilots even from Sacto executive airports. Those to "hot dog" or "Show boat" or show off in the sky over our Folsom homes, helicopters: like News to military national guard, private doctors flying to foreign countries to promote good health, Forest fire water scooper over American River; Law enforcement: Sheriff and CHP and other Law Enforcement Agencies etc. That's a lot of exhaust fumes over Folsom and there's twice a day, 3 times a day 4 times a day to 24 hours a day flying over Folsom. Gambling Co. Casinos airport too Population in Elk Grove, Rancho Cordova, Folsom, Placer County, El Dorado County and Sacto County have increased significantly. Add vehicle exhaust to truck, R.V., huge Camper entertainer buses to buses in general and other types to large motor homes and That's a lot of exhaust pollution besides various types burns I've mentioned to wildfires and controlled burns. Last week I shut off the air conditioner about 9:30 p.m. In addition to my next door neighbors Cheri smoking of cigarettes and he often rolls pipe tobacco into cigarette smoke. I could smell the wildfire smoke from Yuba (s) as I sat wondering about where the smoke was coming from. As several homes in nearby subdivisions caught on fire in past 4 weeks also. I thought of wearing an my allergy (ear loop, paper) mask to bed as the smoke

fried air outside made me sneeze, cough and kept me awake. But suffocation came to mind so I did it put it on. It made my breathing slowed down and I was effected by it and hard to brush my teeth before bed time. That smoke made me also drink more water as I had some phlegm and mucous I was upelling. Smoke from burning such as wood activates both my allergy Chronic Rhinitis and my allergy Chronic bronchitis and a drippy nose with respiratory phlegm & pulsion like a cold and complicates my breathing and sinus fluid drains into one of my ears (usually left) and causes ear painful spasms. It's difficult to tell if I have a cold or pneumonia or the flu or a bacteria or respiratory virus. Along with the weather pressure(s) changes. I carry an emergency inhaler with me 24 hours a day and take 3 other allergy medication.

My neighbor across the street was diagnose with allergy in 2009. The neighbor next to her and also across from me was diagnose with allergies 3 years ago. They had both had an allergy desensitization series shots. They have told me the number of school age minors who go into allergist with asthma and allergies. A lot more children to teens (middle school and teens in high school go for maintenance shots) going into allergists these days. When I was diagnosed in Dec. 1991 with one allergist when I was scheduled to get the shots especially after school and Xmas vacation the waiting room was crowded with mothers and children. When I went to another allergist (Jan. 25, 1992) the waiting room had its share of children babies to 12 years old. The increased number since I had my allergy shots in 1992 to 2006 and 2009 have increased the number of minors getting allergy shots and being tested. It analogly wise reminded of being in orthodontist office and getting braces put on. Yes I had braces because I lost a baby tooth in my adult hood and the space and need to straighten out the upper teeth was needed. There was a lot of children getting braces. I don't know which exceeds the other allergist or orthodontist serving minors. (over)

We need to be doing what we can to keep our environment and eliminating air pollution and less wood burning etc. is needed. Less burning of this type. I'd like to throw away my allergy mask and go around without one like I use to do when the air in Folsom was better. Now it's worse than Los Angeles or Chicago or New York.

Sincerely,

June Chan

140 Fargo Way

Folsom, Ca. 95730