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Toxics Management Division,
2118 Milvia Street, 2nd Floor
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Comments Re: "The Effects of Wood Smoke on our Health: Review of the Problem and Exploration of Remediations"

As someone in the woodburning field who has spent considerable time doing wood smoke research, I would like to commend the Community Environmental Advisory Commission on the content of its recent Wood Smoke "Review of the Problem and Exploration of Remediations" report.

Woodsmoke in sufficient concentration is a proven health hazard. At the same time, a number of effective methods exists to reduce it at source, often dramatically. Woodsmoke emissions are the result of incomplete combustion. Technologies, such as pellet stoves, exist to burn wood completely and cleanly. For particulate emissions, the ratio between best and worst practices is about 50:1. Therefore, targeting the worst offenders is a very effective air quality strategy.

Air quality aside, it should not be forgotten that there can also be an environmental benefit from woodburning. As a renewable resource, it has close to a zero net emission of greenhouse gases. Burned cleanly, it could reasonably become a component in any greenhouse gas reduction strategy that the city of Berkeley may entertain.

The purpose of this letter is to urge the CEAC to consider an additional clean woodburning technology in its list of options - masonry heaters. These appliances burn wood at a sufficiently high burn rate to assure clean combustion, and use a thermal mass to store the heat from a short fire for gradual release to the home. Traditional to the colder regions of Europe, this technology is relatively new in North America. However, we now have a sufficient body of test data to substantiate the claim that this is, by a considerable margin, the cleanest method of burning cordwood.

Unfortunately, the EPA regulation for woodstoves has very narrow terms of reference, and masonry heaters are not included. While the regulation specifically mentions masonry heaters as likely to be cleanburning, the test method is written in such a way that masonry

heaters cannot undergo an EPA certification test. The regulation classes masonry heaters as “non-affected facilities”. The unfortunate, and unintended, result has been that when local jurisdictions mandate “EPA certified stoves only” in clean air regulations, such as the BAAQMD model ordinance, masonry heaters are left out and become banned by default.

Although we have stated our case to BAAQMD, as well as San Jose, our arguments have fallen on deaf ears and received no response. This is perhaps understandable, in that local government often lacks resources these days to engage in regulatory action on such an apparently obscure topic. The Masonry Heater Association has prepared a document that outlines one suggested strategy that a regulator may use to add masonry heaters to its list of approved appliances. It also includes a summary of the test data to back up the claim of clean burning. Please find a copy attached.

I therefore urge the CEAC, as a progressive body, to include masonry heaters in its list of woodsmoke reduction options. As an environmental advisory body, I would urge it to include greenhouse gas reduction in the criteria, along with air quality, associated with wood burning. To ban masonry heaters by default, as has happened in San Jose, would deprive homeowners of one of the greenest home heating options available today.

Yours truly,

A handwritten signature in black ink, appearing to read "N. Senf", written over a light gray rectangular background.

Norbert Senf

Certified heater mason,

Member, Masonry Heater Association