

Appendix A. Copies of all written comments

From: Alene Lindstrand [mailto:collie_mamma@msn.com]
Sent: Friday, April 10, 2015 3:16 PM
To: Ekrem, Joanna (ECY)
Subject: Wood and pellet stove new requirements

Joanna Ekrem,

I am writing to you because I am greatly unhappy with new countywide woodstove burning ban standards recently lowered by the EPA. After attending a public meeting held here in Spokane April 2nd, it is outrageous to even begin to comprehend, as we were told, that Spokane County needs to meet EPA statewide standards EVEN THOUGH WE HAVE HAD NOT BEEN OUT OF COMPLIANCE since 1995, and additionally, Washington state has the highest clean air standards in the nation!! So, we need to meet even stricter and more draconian rules "just because." This does not make sense to meet some standard you've been exceeding all along!

Let's get serious here: this will put a big burden on those who use the renewable resource of wood to heat their homes, primarily, and also as a backup. What's the burden for them? Lowered particulate matter BY MORE THAN HALF will result in practically ALL banned burning days, just a very few. Exemptions COST money. Fines COST money. Ripping out and replacing new, DoE standards for woodstoves COST A LOT of money, selling a non-compliant wood stove will be FINED at \$10,000. How can the DoE be taken seriously when they aren't using any reasonable standards or measurements (because we already exceed standards that they want even lower) "just because." Where's the SCIENCE? and I am not referring to modeling, which is only one tiny part of a multitude of data that needs to be gathered and processed, along with peer reviewed scientific data. We were told this new standard will be for the "health" of the people. Again, where's the scientific data, and who put it together (name, degrees, books written, bias held)? Where's the discussion of long term consequences, such as, NO ONE will be able to use a wood stove by 2020 since the standards will be stricter than nature even. Is the DoE attempting to play God, is nature is not "good" enough for them? Good management and the best scientific uses WILL look at long term consequences, and that is not being done. I would be happy to have your explanation since there was nothing reasonable explained at the meeting.

My goal is to attempt to communicate with you clearly, but I have a strong suspicion that, while my words are defined in Webster's Dictionary, the DoE's words have quite different meanings and I don't know their definitions.

Please DO NOT enforce these lowered impossible standards upon us because we ARE in ambient air compliance and PEOPLE MUST COME BEFORE a bureaucracy's rules that don't make any sense and don't HAVE THE FACTS behind the rules.

Sincerely,

Alene Lindstrand, Realtor, SRES
Century 21 Beutler & Assoc.
509-869-7657
Realtor To The Young At Heart!

From: Bill Demers [mailto:redoakarts@yahoo.com]
Sent: Wednesday, March 18, 2015 10:10 PM
To: ECY RE AQComments; ECY RE AQComments
Subject: Wood burning stoves in Spokane County

My name is William N Demers, PO Box 30217, 10220 S. Sharon Rd. Spokane, WA 99223
I am 55 years old and suffer from severe Osteo and Rhumatoid Arthritis and Neuropathy from Gulliiian-Barre' Syndrome. In fact these malady's are severe enough to make me disabled with SSDI my sole source of income. In Winter I am at times restricted to a wheel chair.

I depend on my wood stove for heat as a form of documented medical treatment for pain relief. Internationally wood heat is well known remedy for pain relief. I am unable to receive pain relief comparable with wood heat. I use an EPA certified stove and burn dry wood so as to prevent smoke. But in the end I will not comply with any regulations attempting to stop me from using my stove for pain relief. Because of my fixed low income wood heat is the only remedy I can afford. Candidly the only way the State can stop me from burning wood for pain relief is to take me away in a body bag.

[Benefits of Heat Therapy for Lower Back Pain](#)



Benefits of Heat Therapy for Lower Back Pain

Explore how heat therapy interacts with the body to alleviate pain as well as options on how to apply heat therapy to help alleviate many types of lower back pain.

View on www.spine-health.com

Preview by Yahoo

From: Bill Demers [mailto:redoakarts@yahoo.com]

Sent: Saturday, March 21, 2015 2:10 PM

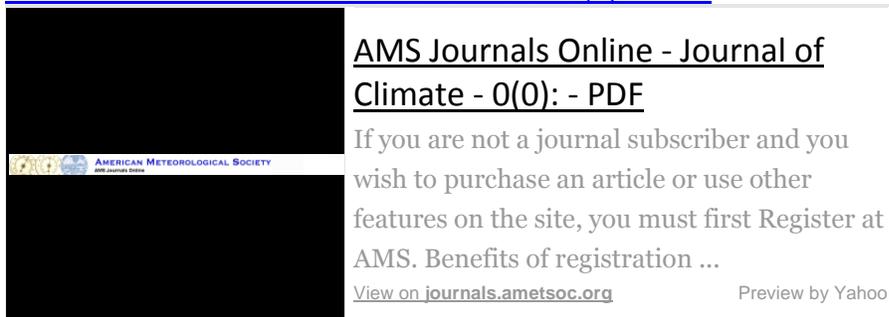
To: Bellon, Maia (ECY); Bellon, Maia (ECY)

Cc: Mrs Lieitz; fcbetts@q.com; ramremfg@aol.com; mpjanson@msn.com; hrpigmee@asisna.com; evandboss@aol.com; soquinn@spokanecounty.org; mpepper4@hotmail.com; bettyboop4344@yahoo.com; tayeetah@hotmail.com; jbeach@capitalpress.com; Gordon & Linda; Dennis Bly; Rene Holiday; Cody Raulston; Scott Neilsen; John Simmons; Peter Davenport; Mike & Connie Smith; Holy, Jeff; khempaulson@msn.com; Toni; thegadys@gmail.com; djmoore@pionnet.com; skoogzoo@yahoo.com; jim@reiffmolding.com; kskoog@pendoreille.org; steve@snrcompany.com; razsqh@stjohncable.com; weezelhead@comcast.net; rholaday7@gmail.com; Blake, Brian; mikebaker2781@msn.com; radcen52@yahoo.com; secretary@okanogancountyfarmbureau.com; Steve Neill; Cindy Alia; Pat L. ; editor@westernagreporter.com ; dboleneus@infomine.com ; Glen Morgan; edit@rangemagazine.com ; Mike Lashaw; Baumgartner, Michael; Grady Houger; capper@wsu.edu ; Jude Capper; Mike Poulson; dkgoodwin@reagan.com ; Derek Dill; Pamela Leslie; bj672bbq@gmail.com ; Dan and Gloria Clark; Alene Lindstrand; Jim Wentland; dkhansen631; chance Gowan; hudson@wsu.edu ; jmorrow@ij.org ; Tip Hudson; ECY RE AQComments; zinniadaze@gmail.com; Russell Emtman

Subject: Another document that shows how Political Agendas supersede science in policy in Washington State

Dear Director Bellon, Spend the time and a few tax dollars to read and learn the truth about Global Warming, then implement knowledge/science driven decisions while directing your agency. The current agenda driven policies of DOE waste money, energies and produce a worsened environment. Not to mention a despicable assault on Liberty.

[AMS Journals Online - Journal of Climate - 0\(0\): - PDF](#)

A screenshot of a webpage from AMS Journals Online. The page features a black header with the text "AMS Journals Online - Journal of Climate - 0(0): - PDF" in white. Below the header is a white banner with the American Meteorological Society logo and the text "AMERICAN METEOROLOGICAL SOCIETY". The main content area is black with white text that reads: "If you are not a journal subscriber and you wish to purchase an article or use other features on the site, you must first Register at AMS. Benefits of registration ...". At the bottom of the page, there is a link "View on journals.ametsoc.org" and the text "Preview by Yahoo".

AMS Journals Online - Journal of Climate - 0(0): - PDF

If you are not a journal subscriber and you wish to purchase an article or use other features on the site, you must first Register at AMS. Benefits of registration ...

[View on journals.ametsoc.org](#) Preview by Yahoo

Thanks

Bill Demers

From: Bryce Morrison [mailto:brycemorrisonspokane@gmail.com]
Sent: Tuesday, March 03, 2015 1:01 PM
To: Ekrem, Joanna (ECY); ECY RE AQComments
Subject: FW: Infrastructure_Rules_and_Programs_SIPs

Because I noticed that the [ecy.wa.gov](http://www.ecy.wa.gov) website did not automatically include your email address, I am re-sending the below message to you as well, since you were mentioned in the message.

If you have any information which we should distribute to our neighborhood in Spokane, please let me know. If you would like to arrange for a local contact in Spokane to speak at our neighborhood council regarding any changes that would impact them, I would like to connect you with our neighborhood council and steering committee's president.

Thank you,
Bryce Morrison
Secretary, Emerson-Garfield Neighborhood Council

From: Bryce Morrison [mailto:brycemorrisonspokane@gmail.com]
Sent: Tuesday, March 3, 2015 12:55 PM
To: carl@spokanecleanair.ccsend.com
Cc: lahu461@ecy.wa.gov; jekr461@ecy.wa.gov; acau461@ecy.wa.gov; mchambers@spokanecleanair.org
Subject: Infrastructure_Rules_and_Programs_SIPs

Regarding the <http://www.ecy.wa.gov/programs/air/sips/plans/infrastructure.htm> webpage and the Message sent by Carl (carl@spokanecleanair.ccsend.com) regarding the Notice of Public Comment Period on State Air Quality Plan, sent on Monday, March 2nd (included below), I believe it would be helpful to direct the public (including myself) to a less formal explanation of how the proposed changes would impact the general public.

If there would be any changes that would impact the public (such as the use of the [burning conditions website](#)), perhaps an article could be posted on our [neighborhood's website](#), or a speaker could be invited to give a presentation at our monthly neighborhood council meeting (averaging 40 attendees).

Thank you,
Bryce Morrison

Below is the email I am referring to:



March 2, 2015

Public Notice/Comment Period on State Air Quality Plan

Ecology is seeking comments on a proposed revision to an air quality plan, called a State Implementation Plan (SIP). The proposed revision is to update Spokane Regional Clean Air Agency's revised regulations for solid fuel burning devices in the Washington SIP. This revision to the SIP is required to meet federal requirements from the U.S. Environmental Protection Agency, and is designed to reduce wood smoke emissions and maintain compliance with federal air quality standards within Spokane County.

You may review and comment on the proposed plan revision March 2, 2015 through April 3, 2015. The document is available for review at:<http://www.ecy.wa.gov/programs/air/sips/plans/infrastructure.htm>.

To comment on the plan revision or to request a public hearing:

- email AQComments@ecy.wa.gov
- mail comments to: Joanna Ekrem, Air Quality Program, Washington State Dept. of Ecology, P.O. Box 47600, Olympia, WA 98504-7600

For more information or to request a public hearing, contact Joanna Ekrem at (360) 407-6826 or joanna.ekrem@ecy.wa.gov. Requests for a public hearing must be received by March 23, 2015.

If a hearing request is received by the deadline, it will be held at 9:30 a.m. on April 2, 2015, at Spokane Regional Clean Air Agency office: 3104 E. Augusta Avenue, Spokane, WA 99207. If a hearing request is not received, Ecology will announce a cancellation of the April 2 hearing on its public involvement calendar.

For more information visit www.SpokaneCleanAir.org or <http://www.ecy.wa.gov/programs/air/sips/plans/infrastructure.htm>.

Forward email



This email was sent to brycemorrisonspokane@gmail.com by mchambers@spokanecleanair.org | [Update Profile/Email Address](#) | Rapid removal with [SafeUnsubscribe™](#) | [Privacy Policy](#).



Spokane Regional Clean Air Agency | 3104 E. Augusta Avenue | Spokane | WA | 99207

Catherine Isabel
P.O.Box 18708
Spokane, Wa 99228

RECEIVED

APR 06 2015

Dept of Ecology

Ms. Joanna Ekrem
Air Quality Planner
WA State Dept. of Ecology
P.O.Box 47600
Olympia, WA 98504-7600

April 3, 2015

Dear Ms. Ekrem,

yesterday I attended the public hearing about Spokane, Solid Fuel Burning Devices Rule and a Required Revision to the State Implementation Plan(a long plan!).

It became clear to me after some comments by other attendees that all objected to interference "by governments being told what to do or what not to do, even coming on their properties."

I would have liked to say my part, but after listening to those uneducated comments, I decided to rather be quiet instead of being cruzified by these people. Revenge is known around here when one differs from their way.

Being European born, I am appalled by this Wild West attitude and culture to object to any improvement of air quality (probably water quality as well) toward the common good for all. The selfishness and inconsideration I have experienced in this part of the US is far from how I was brought up and I have learned in my long life in other parts of the world.

I am very glad and appreciative that there is an EPA, despite all the law suits and opposition what the EPA has done and is still doing. Keep going and don't let the corporations run the show despite all the money and buying politicians. There are many more of us who oppose being governed that way. This selfish and often insane generation will be gone one day. The younger ones, it is hoped, will have more common sense and change will eventually happen.

Unfortunately I have lived next to one of those selfish, uneducated, drunk and pot smoker.wackoes (it's supposed to be a good neighborhood, coming from another state I did not know) who has been burning wood and whatever else ever since he moved here, before I moved. I wish I had known and would have never bought a house next to him. My garden work is no joy. I inhale this polluted air when the wind is blowing toward my property. I have to retreat inside with doors and windows closed. There have been complaints by others about him, I have heard. I will take photos of the black smoke when I observe it.

Page two to Ms. Joanna Ekrem from Catherine Isabel, April 3, 2015

I do not use the two fireplaces in my house because of adding to air pollution, rather had an energy efficient gas furnace installed. It's costly but then I do not drink, never smoked, never used drugs and do not have a tattoo. That is costly as well. It depends what one's value is.

Please do what needs to be done and make sure that you do not fall into the trap of so many liars in order to get what they want and do what they want. With so many people in a country, there need to be restrictions, otherwise we all live in chaos and lawlessness. The present world situation clearly shows what such condition is like. Who wants to live in polluted Chinese air? Common sense needs to win instead of the "wild ones" who prefer anarchy.

Thanks for your work, best wishes!

Catherine Isabel

PS. According to today's NPR announcement recycling companies are going out-of-business because they do not make enough money! Are we going backwards about the environment?

From: Christine Keck [mailto:ckeck12@yahoo.com]
Sent: Monday, April 06, 2015 3:03 PM
To: ECY RE AQComments
Subject: SFBD rule to EPA for approval in Washington's SIP?

Dear Sirs:

Should Ecology submit the revised SFBD rule to EPA for approval in Washington's SIP?

I say -NO!

I am not happy with the attempt to force such strict particle emission standards upon us who have wood burning products to heat our homes.

I have been a very careful wood as an energy source use all of my over 60 years. I have been and still am as careful to burn cleanly as possibly can manage. It is part of our areas culture, my preference as to heating style and the extreme measure you are considering would put my family in GREAT financial burden to try to change to a non-wood source of heat. All human consumption on planet earth is NOT all harmful and should not be treated as such. A more REALISTIC amount of particulate is what I am asking you to look into for regulations. The EPA tends to go to extremes and behaves to the public as if they(epa) are always the only way and the public are just dummies. We are not and we can only do so much in reality.

Please do not just "jump off the deep end " as the saying goes and automatically go along with any new rules-think and research how much as a real breathing person not just a graph I can do to burn clean but still be warm!

Thank you,
Christine Keck

From: zapox6@afo.net [mailto:zapox6@afo.net]
Sent: Friday, April 10, 2015 3:50 PM
To: Ekrem, Joanna (ECY)
Subject: Regarding air quality standards in Spokane County

Dear Ms. Ekrem:

I attended your hearing on April 2nd regarding the adoption of the EPA SIP revision plans that the EPA is requesting for approval in Spokane County. I appreciate the information you gave us and the opportunity to input my opinion.

Since Washington State and Spokane County are currently within the particulate levels that the EPA has put in place, I fail to see why our citizens here should be pressured to meet new lower standards that are unscientifically substantiated as a threat to our health. In my view, we do not need any more "Burn bans" in Spokane County. We do not need to force people to tear out stoves or other wood or pellet burning devices that keep them warm. We do not need inspectors knocking on the doors of our citizens because the color of the smoke coming out of their chimneys is "suspect". This constitutes an over zealous government abusing the rights of our citizens to privacy and freedom from needless harassment from agency officials.

There is real danger in our county submitting the SIP revision plan that EPA is requesting for their approval. Please don't do it!!! (Right now Spokane County is NOT under EPA authority on the SIP implementation plan.) Your staff admitted at the hearing that SHB2326 (passed in 2012) gives to DOE "enforcement capabilities" thru working with "other agencies" including the County Sheriff's Department. There are also fines possible for selling a stove alluded to in one of the D.O.E. brochures titled "Which wood burning devices can be sold in Washington?". A citizen could be fined as much as \$10,000 for selling a non compliant stove. (Most stoves sold commercially in recent years are complying with the current 4.5 standard NOT the "new" 2.0 standard. Many of us have purchased these stoves recently, and they were not cheap.)

New lower EPA standards went into affect nationwide April 3, 2015. (Washington already has the highest clean air standards in the nation.) Stove emissions--which includes pellet stoves-- must currently be below 4.5 grams of particulates per hour --the new standards will be lowered every year to 2.0 grams of particulates per hour by 2020....such a tiny amount according to local scientist Dave Boleneus as to be laughable as being labeled "dangerous". (Where is you science?) Consequently, no one will be able to use a wood stove by then.

I am very, very concerned about this issue. SPOKANE COUNTY ALREADY MEETS OR EXCEEDS CURRENT NATIONAL AMBIENT AIR QUALITY STANDARDS. DOE and SCRPA inspections will be possible after Jan. 1st 2016, and stoves could be torn out of private homes or rendered inoperable as in Oregon. This could be done without the "due legal processes" that are guaranteed not only under our U.S. Constitution but under our State Constitution. Remember, you are supposed to be protecting the citizens of Spokane County, not harassing and hurting them.

Cindy Zapotocky--Spokane County Citizen
1728 E. Rockwood Blvd.
Spokane, Wa 99203
509-534-5707



Your science does not support your premise that Spokane "has a problem"

Citizens' Alliance for Property Rights

718 Griffin Avenue # 7 Enumclaw, Washington 98022

April 2, 2015

To Spokane Regional Clean Air Agency (SRCAA):

Citizens' Alliance for Property Rights (CAPR) www.capr.us would like to comment on your proposed rules for managing wood and pellet stoves. CAPR is made up of fifteen chapters and three affiliates in WA State, plus five chapters in California. The Spokane Chapter of CAPR is very concerned about the trend that the Department of Ecology (DOE) and the Environmental Protection Agency (EPA) are taking against private property owners who use wood to heat their homes and businesses. CAPR does not think the board of SRCAA should adopt the EPA's overzealous air quality directives for the following reasons.

COSTS OF NEW WOOD STOVES WILL INCREASE: Spokane residents who use wood to heat their homes will experience financial hardships if SRCAA adopts EPA's newly proposed federal rules for wood stoves. WA State already has cleaner air standards than EPA. But, EPA's '5 Year Clean Air Dream Scheme' would lower the stove emissions allowed from 4.5 grams of particulate per hour this year to 2.5 grams per hour by 2020. Wood stoves have come a long way since the 70s and 80s when they emitted 65 grams of particulate per hour. In order to achieve the 2.5 grams per hour that EPA wants by 2020, manufacturers will need to redesign stoves which could more than double the cost of wood burning appliances. According to the National Federation of Independent Business, manufacturers of wood stoves have estimated that the proposed new emission requirements could virtually end the burning of wood for heat in the US. That's why several states are pushing back the new wood stove proposed emission rules by the EPA.

new
BURN BANS WILL INCREASE: State rules for burn bans in the 2012 WA State wood stove bill (SHB 2326) are being implemented this year. As a result, thresholds for determining when DOE or air agencies may call bans have gone from 35 micrograms to 30 micrograms per cubic meter. This will lead to more burn bans in Spokane, since a chart I reviewed showed that Spokane did not go below the 35 limit with burn bans very often in the last few years. But, if the threshold is lowered to 30, more burn bans will be called. Just as Avista is raising rates to update their system, more and more Spokane residents will look to wood heat to supplement their heating bills. They won't be able to rely on using wood heat if more frequent and unnecessary burn bans are called to meet lower thresholds.

cheap
WOOD IS A RENEWABLE RESOURCE: Firewood is plentiful in the Spokane region. Forests stay healthier and are less prone to forest fires if dead trees are thinned for firewood. How much pollution was released due to the Carlton Fire Complex in one day compared to one year of wood stove usage in the Spokane area? Spokane area residents are being good stewards by using a renewable resource that helps to keep our forests healthy.

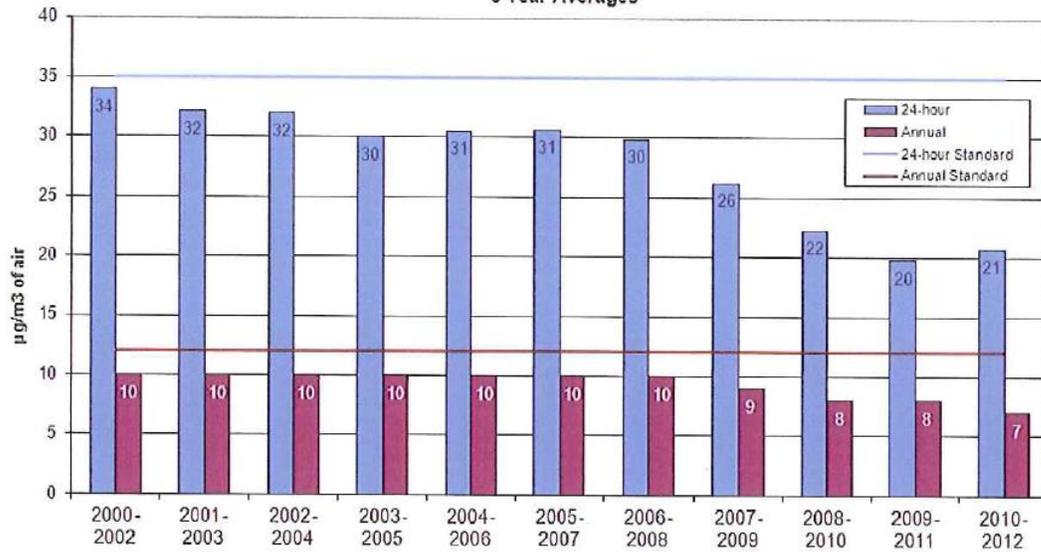
FINES AND FINANCIAL HARDSHIPS WILL INCREASE: The Puget Sound Clean Air Agency went even further than the EPA when it banned wood burning in King County for several days and levied \$1,000 fines. SRCAA should not follow EPA's one size fits all rule which would effectively ban production of 80% of all wood stoves in America. EPA is proposing rules which will mostly impact folks on fixed incomes and or rural residents.

We all want clean air, but won't accept cold homes. Don't impose EPA's emission scheme which the National Federation of Independent Business says could eventually end the burning of wood for heat in America.

st
Cindy Gapobsky, Spokane CAPR President 509-534-5707

Spokane County PM_{2.5}

24-Hour data; FRM
3 Year Averages



The 24-hour standard is the 3 year average of the 98th percentile of each year, which must not to exceed 35 µg/m³
 The annual standard is the 3-year average of the annual mean concentrations and must not exceed 12.0 µg/m³
 These data were obtained using a PM_{2.5} Federal Reference Method air pollution monitor operated at the Spokane-Ferry Ave (Jan 2000 - Mar 2009) and the Spokane-Augusta Ave (Apr 2009 - Dec 2012) monitoring stations.

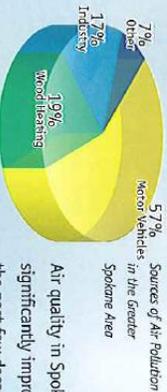
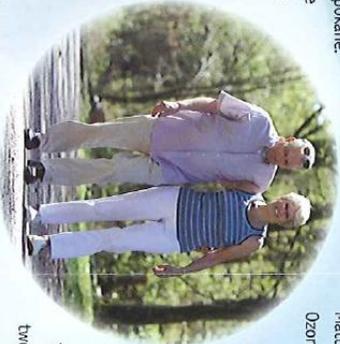
Source: Spokane Regional Clean Air Agency, December 2012

Air Pollution

The Problem:

Air pollution not only affects our health, it can dull the view of our scenic vistas, such as Mt. Spokane.

Visible and invisible pollutants are easily trapped in our bowl-shaped terrain, sometimes building to unhealthy levels. The two most problematic seasons for our air quality are winter and summer: winter's cold, clear and calm weather conditions inhibit air pollutants from dispersing. And summer's hot, sunny days contribute to the formation of ground-level ozone, a main ingredient of smog.



Air quality in Spokane has significantly improved over the past few decades, but we still have plenty of work to do to ensure healthy air quality in the future. Meeting new, more stringent air quality standards for fine particles is a top priority. Fine particles come mainly from wood burning and diesel exhaust.

Automobiles, industrial solvents and combustion processes all contribute to ground-level ozone. To maintain healthy air, we must continue to find ways to reduce emissions from these sources.



How It Harms

The Consequences:

The two most prevalent air pollutants in our area are Particulate Matter—fine particles of dust, soot, and smoke; and Ground-Level Ozone—a key ingredient of smog.

Particulate Matter (PM) is solid or liquid particles suspended in the air. When inhaled, these microscopic smoke and dust particles penetrate deep into the respiratory system, causing breathing difficulties and tissue damage. The elderly, children and people suffering from heart and lung diseases are at higher risk. There are national health, based standards for two categories of particles:

- **Fine particles (PM_{2.5})** – measuring 2.5 microns in diameter in size or smaller. Fine particles come mainly from combustion-related activities, such as wood burning and gasoline and diesel-powered cars and trucks.
- **Coarse particles (PM₁₀)** – measuring 10 microns in diameter in size or smaller. Coarse particles come mainly from resuspended road dust caused by vehicle travel on paved and unpaved roads and from an occasional windblown dust event.

Ozone (O₃) occurs naturally in the upper atmosphere, protecting us from the sun's ultraviolet radiation. However, at ground-level, ozone is an air pollutant that can harm our health. Ground-level ozone is a concern during summer because it is formed when vapors (from solvents, paints and gasoline) react in the atmosphere with oxides of nitrogen (from fuel combustion) in the presence of sunlight. Elevated levels of ozone can cause lung damage, coughing and wheezing. People with chronic respiratory problems such as asthma, are most sensitive to increases in ozone. At low levels, ozone can irritate throat, nose, and eyes.

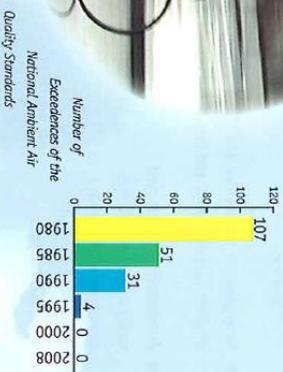


What You Can Do

The Choices:

Thanks to significant efforts made by businesses, and improvements in automobile emissions technology, the air we are breathing today is cleaner than it was even a decade ago.

But with motor vehicles and wood heating accounting for more than 75 percent of our annual air pollution, growth threatens our clean air progress.



Industrial and commercial facilities have been working to reduce their air emissions. Now it's time for each individual to play an important role in protecting our air quality through daily choices about transportation, auto maintenance, home heating, and yard debris disposal. We are the solution!

Working with you for clean air

Clean, Healthy Air... It's Up To You.

- Help reduce the number of cars on the roads during busy commute hours. Ride the bus, carpool, walk or ride a bike.
- Cut down on unnecessary car trips. Combine errands and use the telephone first to cut down on "browsing time" in your car. Organize a carpool for your children's activities with other parents.
- Keep your car maintained and tires properly inflated for greatest fuel efficiency and less pollution.
- Avoid driving on unpaved roads whenever possible. Keep your speed down if you must travel on unpaved surfaces.
- If you use wood to heat your home, burn only clean, dry wood and keep the damper open to allow plenty of air to your fire.
- Upgrade your wood stove or fireplace insert to a more efficient, EPA-certified device or natural gas appliance.
- Mulch or compost grass clippings, tree trimmings and other natural debris instead of burning.
- Switch to electric yard and garden equipment where feasible.



Clean, Healthy Air... *It's up to all of us.*



3104 E. Augusta Avenue
Spokane, WA 99207

www.spokanecleanair.org

Phone: (509) 477-4727

Burn Info Line: (509) 477-4710

Air Quality Data (509) 477-2571

JULY 2009

From: Clarice Ryan [<mailto:clariceinmt@gmail.com>]
Sent: Thursday, April 09, 2015 2:03 PM
To: Ekrem, Joanna (ECY)
Subject: SPOKANE CAPR ALERT: Wood stoves Restricted

Dear Joanna,
WA STATE DEPARTMENT OF ECOLOGY

We in Montana strongly urge opposition to restrictions on use of wood burning stoves. Low income families would be seriously harmed by stringent requirements which might force them to purchase new stoves or even to refrain from wood heat.

Apparently CO2, smoke, ash and burned animal carcasses from wildfires of USFS OVERGROWN forests are not being considered a problem from a pollution standpoint.

However, firewood collectors (not allowed to collect dead fuels from these federal forests) attempt to find enough firewood elsewhere to sell to customers struggling to reduce their heating costs. Now federal restrictions prevent homeowners from benefitting from burning the waste from dead and dying forests that could be providing heat for their homes. Limits on use of firewood for heat, in my mind constitutes an injustice to citizens by their own government, for no valid constructive reason.

If concerns over emissions from these stoves, is being largely based upon CO2 production, we should acknowledge that it is far below what is happening naturally in the environment: forest fires, volcanoes, and respiration by all living creatures on earth. The science has not yet proven that global warming has been caused by CO2, or even that Climate Change has resulted from it. Climate has changed since the formation of the earth and the origins of humanity living on it. All of these unproven concepts are negatively impacting the economy of our communities and the entire country, basically the world.

Clarice Ryan
253 Pine Needle Lane
Bigfork, Montana, 59911 406- 837-6929

WOOD STOVE STANDARDS IN SPOKANE ARE ABOUT TO CHANGE: Your input is urgently needed by this Friday, April 10th. See attached the CAPR Spokane letter that was submitted at the Spokane County Clean Air Agency hearings recently. See also the excellent video made by John Charleston of one of those hearings....

THE STATE DEPARTMENT OF ECOLOGY WILL ONLY TAKE COMMENTS THROUGH THIS COMING FRIDAY APRIL 10TH.....SEND EMAILS TO Joanna.ekrem@ecy.wa.gov Thanks Clarice. You will also be impacted, since the EPA has national standards which will be inflicted on everyone....even if you live in a pristine area of Montana. Check out the federal register Feb 3, 15 notice about wood stoves by the EPA.

I hope you will attend our May 22 dinner and workshops.
Gloria



Citizens' Alliance for Property Rights

718 Griffin Avenue # 7 Enumclaw, Washington 98022

April 2, 2015

To Spokane Regional Clean Air Agency (SRCAA):

Citizens' Alliance for Property Rights (CAPR) www.capr.us would like to comment on your proposed rules for managing wood and pellet stoves. CAPR is made up of fifteen chapters and three affiliates in WA State, plus five chapters in California. The Spokane Chapter of CAPR is very concerned about the trend that the Department of Ecology (DOE) and the Environmental Protection Agency (EPA) are taking against private property owners who use wood to heat their homes and businesses. CAPR does not think the board of SRCAA should adopt the EPA's overzealous air quality directives for the following reasons.

COSTS OF NEW WOOD STOVES WILL INCREASE: Spokane residents who use wood to heat their homes will experience financial hardships if SRCAA adopts EPA's newly proposed federal rules for wood stoves. WA State already has cleaner air standards than EPA. But, EPA's '5 Year Clean Air Dream Scheme' would lower the stove emissions allowed from 4.5 grams of particulate per hour this year to 2.5 grams per hour by 2020. Wood stoves have come a long way since the 70s and 80s when they emitted 65 grams of particulate per hour. In order to achieve the 2.5 grams per hour that EPA wants by 2020, manufacturers will need to redesign stoves which could more than double the cost of wood burning appliances. According to the National Federation of Independent Business, manufacturers of wood stoves have estimated that the proposed new emission requirements could virtually end the burning of wood for heat in the US. That's why several states are pushing back the new wood stove proposed emission rules by the EPA.

BURN BANS WILL INCREASE: State rules for burn bans in the 2012 WA State wood stove bill (SHB 2326) are being implemented this year. As a result, thresholds for determining when DOE or air agencies may call bans have gone from 35 micrograms to 30 micrograms per cubic meter. This will lead to more burn bans in Spokane, since a chart I reviewed showed that Spokane did not go below the 35 limit with burn bans very often in the last few years. But, if the threshold is lowered to 30, more burn bans will be called. Just as Avista is raising rates to update their system, more and more Spokane residents will look to wood heat to supplement their heating bills. They won't be able to rely on using wood heat if more frequent and unnecessary burn bans are called to meet lower thresholds.

WOOD IS A RENEWABLE RESOURCE: Firewood is plentiful in the Spokane region. Forests stay healthier and are less prone to forest fires if dead trees are thinned for firewood. How much pollution was released due to the Carlton Fire Complex in one day compared to one year of wood stove usage in the Spokane area? Spokane area residents are being good stewards by using a renewable resource that helps to keep our forests healthy.

FINES AND FINANCIAL HARDSHIPS WILL INCREASE: The Puget Sound Clean Air Agency went even further than the EPA when it banned wood burning in King County for several days and levied \$1,000 fines. SRCAA should not follow EPA's one size fits all rule which would effectively ban production of 80% of all wood stoves in America. EPA is proposing rules which will mostly impact folks on fixed incomes and or rural residents.

We all want clean air, but won't accept cold homes. Don't impose EPA's emission scheme which the National Federation of Independent Business says could eventually end the burning of wood for heat in America.

From: David Boleneus [<mailto:boleneus@gmail.com>]

Sent: Friday, April 10, 2015 10:13 AM

To: Holy, Jeff; Parker, Kevin; Shea, Matt; Judith.warnick@leg.wa.gov; Baumgartner, Michael; Schoesler, Mark; Doug@SenatorEricksen.com; Ekrem, Joanna (ECY); Dan and Gloria Clark; redoakarts@yahoo.com

Subject: pm 2.5

I submitted similar comments to Ecology yesterday re: the lowering of particulate material size on wood stoves from pm 10 to pm2.5. Here I have made some changes and so am re-submitting them again with corrections. Today is the deadline for submitting comments. This process seems ill-publicized and hurried? Is that with conscious intent so as not too involve too many that would be as enraged as I if they were given the opportunity to understand the impact of this new standard?

Topic item:-emission level greater than 35 microgram per cubic meter (ug/m3) is considered a violation of the clean air act, or pm>2.5 represents a violation.

I have many and very serious complaints about this limit but I will try here to include all. I don't have time to do my job, which my employer prefers, do your job too, and counter or submit all comments in organized prose, so here goes.

What is the limit, one or both: 35 ug/m3 or pm2.5? (there are more questions below)

You mentioned that emissions that exceed the limit of 35 micrograms per cubic meter are in violation of the clean air act but in your next breath you say the limit is pm 10 or pm>2.5. A microgram is a measure of mass where the pm 2.5, which is 2.5 microns (a millionth of a meter) is a measure of length. Do you know this difference? You confuse these measures. They are not the same.

Also if you are confused, as seems apparent from your casual acceptance of this limit, which I consider extremely egregious, it is also then impossible for you to communicate the very serious concerns and the meaning of this limit to the public.

The first point I want to make is your agency's cavalier use of this limit of 35 ug/m3 and pm 2.5. Your use of these figures is so loose that people are led to believe that its "no big deal" or that it's of "no significance" when it is exactly the opposite. Well it is significant. It's a really big deal and you do not communicate just how incredibly small this particle is. It is so big a deal that this limit will be impossible to meet. I do not believe you have a mental concept of how small is this amount. You certainly have not communicated this to the public, completed any due diligence, a cost analysis, an analysis of the impact upon people, or compared it to other particles or said what impact this will have on peoples lives. People want to know what they cannot do if they must meet this standard. Do you know this?

For example, compared to a cubic meter of rock of average density, since you use this measure, is about 2600 kg (kilograms or 2.9 tons), the cubic meter of rock contains 2,600 billion micrograms if my calculation is correct, but in your third breath you say, without knowing this, that 1/74,000,000,000th (one 74 billionth) of this ton represents a violation of the law. What!! Just because today's analytical equipment in the laboratory can measure to this level doesn't mean its logical. This demonstrates the total ignorance of your words. You believe you can say this but it is obvious you are lacking knowledge of its relevance.

For example, pollen particles range from 10 to 150 microns. So are you going to fine the food producer with your next ruling because pollen particles are larger than pm2.5, say, for apples the largest agric. crop in Washington, when the pollen particle from his/her orchard exceeds your pm 2.5? Are you going to fine wheat and corn farmers for growing food in the Columbia Basin when the wind blows to carry dust away that exceeds pm2.5? Are you going to fine people for using antiperspirant when its particles are larger than pm2.5 which they always are? Are you going to fine people when they exhale or sneeze when such particles are larger than pm2.5? Are you going to fine people for using coffee or cayenne pepper or yeast to make bread because coffee dust or cayenne pepper or yeast particles exceed pm2.5?

Here are other examples of particle sizes, mold spores-3 microns, end of needle 1230 microns, moss-150 microns, fertilizer-10 microns, cayenne pepper-15 microns, saw dust-30 to 4000 microns, dust mites-30 microns, coffee-5 to 400 microns, cement dust-3 to 300 microns, mold-10 to 30 microns, red blood cells-5 to 10 microns, mustard-6 to 10 microns, antiperspirant-6 to 10 micros, sand that fell in Spokane from Mt St Helens-1230 microns, hair-200 microns, a dot on this page-615 microns, face powder-30 microns, copier toner-15 microns, yeast-1 to 50 microns, insecticide dust-10 microns, liquid droplets from your breath or sneeze-0.5 to 5 microns, pollen from corn in Washington grown for food, anthrax spores-5 microns, dust from farm fields in Washington that grow wheat for food that keeps families' in business reaching Spokane when the wind blows-10 to 400 microns*and best of all is that your home vacuum cleaner only captures particles larger than 40 microns.*

I am a farmer and I am concerned and so should be you.

The last two examples show how ridiculous is the pm 10 standard, while you so cavalierly promote the pm2.5.

If a mother is baking in this kitchen using flour or dad is frying bacon, both are exceeding this standard for pm2.5

Do you plan on stopping all of these particles now that the limit is pm2.5? Where does this stop? Is any logic engaged?

So I want to know if you plan on presenting citations to all of these sources after the fireplaces, wood stoves? Is it then on to the orchardists, the wheat farmers...? These examples show just how ridiculous is this plan. This plan does not represent reality. It is a dream.

I also want to know what devices can or cannot be used to meet your standard. You mention woodburning stoves yet give examples of other devices, certified and uncertified stoves, pellet stoves, oil furnace, coal furnace, gas furnace, fireplace. I want you to conduct courses at colleges on how to understand these limits so that people can appreciate and have the time to think about it. I want you to broadcast all the negatives about what you are doing, not just the "feel good" attitudes that now we are protecting the public when they are instead being swindled.

I also want to know what devices can or cannot be used in time of emergency, in time of an other ice storm or during a electrical outage, in time when the Governor orders we pay more for fuel to battle non-existent climate change that many cannot afford that fuel. Will you then fund the poor to pay for fuel from the Governor's new tax? He intends his tax to stop climate change (how ridiculous, again) but it would then be a Robin Hood tax of the rich to give to the poor. What will be the policy on all of this? We are told to toe the line on the pm2.5 but what about these other situations.

I want to see the data that is used to monitor Spokane's air. Is it secret? I want to see it. I want to examine and analyze it. I want the raw data, not data massaged first then made available. I want to see an explanation of the data, the data, and how decisions are made by its use. You need to broadcast where the data is made available.

I am not asking you these questions for you just to provide answers. I am telling you that you must do this. You must do this if you serve Washington. It is your duty to serve Washington.

Frankly, I do not understand why I must waste my time telling you how ridiculous are these standards. This is a perfect example of how people in government have now exceeded their level of competence in dealing with such matters. To people knowledgeable, it should be so plain that our state should reject this standard outright without needlessly involving the public. You have lost sight of your job of serving people of the state of Washington and instead serve the EPA.

It appears to me, by your apparent cavalier acceptance of this standard, that rather than serve Washington, you instead acquiesce to extortion by the EPA?

David Boleneus
Spokane, WA
5094689062
boleneus@gmail.com

From: Dave Boleneus [mailto:dboleneus@infomine.com]

Sent: Thursday, April 09, 2015 1:54 PM

To: ECY RE AQComments

Cc: rehinman1@msn.com; fhb_geo@comcast.net; Dan and Gloria Clark; Bill Demers; Dan Boleneus

Subject: air quality comment

Topic item:-emission level greater than 35 microgram per cubic meter (ug/m3) is considered a violation of the clean air act, or pm>2.5 represents a violation.

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For example, compared to a cubic meter of rock, since you mention this measure, is about 1000 kg (2.5 tons), the cubic meter of rock contains 3 billion micrograms if my calculation is correct, but in your third breath you say that 1/3,000,000,000th of this ton represents a violation of the law. What!! This demonstrates the total ignorance of your words. You believe you can say this but without knowledge of its relevance.

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From: Dave Boleneus [<mailto:dboleneus@infomine.com>]

Sent: Thursday, April 09, 2015 9:15 AM

To: Ekrem, Joanna (ECY)

Subject: Wood stoves

Checking out at the store, the young cashier suggested to the much older lady that she should bring her own grocery bags, because plastic bags are not good for the environment.

The woman apologized to the young girl and explained, "We didn't have this 'green thing' back in my earlier days."

The young clerk responded, "That's our problem today. Your generation did not care enough to save our environment for future generations."

The older lady said that she was right -- our generation didn't have the "green thing" in its day. The older lady went on to explain:

Back then, we returned milk bottles, soda bottles and beer bottles to the store. The store sent them back to the plant to be washed and sterilized and refilled, so it could use the same bottles over and over. So they really were recycled. But we didn't have the "green thing" back in our day.

Grocery stores bagged our groceries in brown paper bags that we reused for numerous things. Most memorable besides household garbage bags was the use of brown paper bags as book covers for our school books. This was to ensure that public property (the books provided for our use by the school) was not defaced by our scribbles. Then we were able to personalize our books on the brown paper bags. But, too bad we didn't do the "green thing" back then.

We walked up stairs because we didn't have an escalator in every store and office building. We walked to the grocery store and didn't climb into a 300-horsepower machine every time we had to go two blocks.

But she was right. We didn't have the "green thing" in our day.

Back then we washed the baby's diapers because we didn't have the throw away kind. We dried clothes on a line, not in an energy-gobbling machine burning up 220 volts. Wind and solar power really did dry our clothes back in our early days. Kids got hand-me-down clothes from their brothers or sisters, not always brand-new clothing.

But that young lady is right; we didn't have the "green thing" back in our day.

Back then we had one TV, or radio, in the house -- not a TV in every room. And the TV had a small screen the size of a handkerchief (remember them?), not a screen the size of the state of Montana. In the kitchen we blended and stirred by hand because we didn't have electric machines to do everything for us. When we packaged a fragile item to send in the mail, we used wadded up old newspapers to cushion it, not Styrofoam or plastic bubble wrap. Back then, we didn't fire up an engine and burn gasoline just to cut the lawn. We used a push mower that ran on human power. We exercised by working so we didn't need to go to a health club to run on treadmills that operate on electricity.

But she's right; we didn't have the "green thing" back then.

We drank from a fountain when we were thirsty instead of using a cup or a plastic bottle every time we had a drink of water. We refilled writing pens with ink instead of buying a new pen, and we replaced the razor blade in a razor instead of throwing away the whole razor just because the blade got dull.

But we didn't have the "green thing" back then.

Back then, people took the streetcar or a bus and kids rode their bikes to school or walked instead of turning their moms into a 24-hour taxi service in the family's \$45,000 SUV or van, which cost what a whole house did before the "green thing." We had one electrical outlet in a room, not an entire bank of sockets to power a dozen appliances. And we didn't need a computerized gadget to receive a signal beamed from satellites 23,000 miles out in space in order to find the nearest burger joint.

But isn't it sad the current generation laments how wasteful we old folks were just because we didn't have the "green thing" back then?

Please forward this on to another selfish old person who needs a lesson in conservation from a smart ass young person.

We don't like being old in the first place, so it doesn't take much to piss us off... Especially from a tattooed, multiple pierced smartass who can't make change without the cash register telling them how much.

Vivian West

David Boleneus

Geologist, MS LG

CostMine Div. of InfoMine USA Inc.

100 North Mullan Road #102, Spokane, WA 99206

T 509.328.8023 F 509.328.2026

dboleneus@infomine.com

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From: Dennis Reed [<mailto:hangardad@gmail.com>]

Sent: Thursday, April 09, 2015 10:44 AM

To: Ekrem, Joanna (ECY)

Subject: Wood Stove Standards

To All,

The wood stove industry has done an incredible job of improving the efficiency of their products over the last 15 years and new technology is continuing to advance. I've seen no scientific data published that would support any tightening of wood stove standards in the Spokane area, let alone Eastern Washington, the Inland Empire, the West Plains, North Idaho or any other designated research area. I see this as another taxing authority trying to justify their annual budget and punish residents who already pay too much tax. It's time to get financially organized and consider moving out of this state. Never in my life have I use the term "Ex-Pat". May be it's time. And don't even talk to me about "carbon footprint" another one our government's big lies.

--

Kind regards,

Dennis Reed
509-990-3188

From: Dan and Gloria Clark [<mailto:gclark@air-pipe.com>]
Sent: Tuesday, March 17, 2015 4:19 PM
To: Ekrem, Joanna (ECY)
Subject: Re: public hearing request for wood stove burn ban in Spokane County

Joanna,

Thank you for setting up an additional evening meeting.

Gloria

From: [Ekrem, Joanna \(ECY\)](#)
Sent: Tuesday, March 17, 2015 4:13 PM
To: [Dan and Gloria Clark](#)
Cc: [Julie Oliver](#) ; [Margee Chambers](#)
Subject: RE: public hearing request for wood stove burn ban in Spokane County

Hi Gloria,

Thank you for your interest. We had a meeting this afternoon and decided to hold an additional public hearing on April 2 at 6pm at Spokane Regional Clean Air Agency: 3104 E. Augusta Avenue, Spokane WA 99207. We will still also hold one at 9:30 am on April 2. The public comment period is extended an extra week through April 10.

Please let me know if you have any questions or would like to discuss this in more detail. Over the next couple days, we will be updating our public involvement calendar and website and will send out e-mail notifications to let members of the public know about these changes.

Best Regards,
Joanna

Joanna Ekrem

| Air Quality Program |
| WA State Dept of Ecology |
| Telephone 360.407.6826 |

From: Dan and Gloria Clark [<mailto:gclark@air-pipe.com>]
Sent: Tuesday, March 17, 2015 4:00 PM
To: Ekrem, Joanna (ECY)
Subject: Re: public hearing request for wood stove burn ban in Spokane County

Hello Joanna,

Have you scheduled an evening meeting to accommodate working folks? I need to know soon.

Thanks,
Gloria Clark

From: [Ekrem, Joanna \(ECY\)](#)

Sent: Wednesday, March 11, 2015 10:02 AM
To: [Dan and Gloria Clark](#)
Subject: RE: public hearing request for wood stove burn ban in Spokane County

Gloria,

Thank you for your request by e-mail and voicemail to change the time of the public hearing and extend the public comment period. I tried to give you a call you back but you did not answer. We are considering your request and will let you know what we decide. Please let me know if you have any questions or would like to learn more about what Ecology is accepting comment on. Also I want to let you know that the notice of the public hearing is publicly accessible on Ecology's website, public involvement calendar, and we sent out several notifications.

Joanna

From: Dan and Gloria Clark [<mailto:gclark@air-pipe.com>]
Sent: Monday, March 09, 2015 10:21 PM
To: Ekrem, Joanna (ECY)
Subject: Re: public hearing request for wood stove burn ban in Spokane County

Joanna,

The meeting needs to be changed to an evening format, so hard working folks can attend. Which date in the evening will work for you?

Cordially,

Gloria Clark

From: [Ekrem, Joanna \(ECY\)](#)
Sent: Monday, March 09, 2015 5:42 PM
To: [Dan and Gloria Clark](#)
Subject: RE: public hearing request for wood stove burn ban in Spokane County

Hi Gloria,
Thank you for letting me know.
Joanna

From: Dan and Gloria Clark [<mailto:gclark@air-pipe.com>]
Sent: Monday, March 09, 2015 5:15 PM
To: Ekrem, Joanna (ECY)
Subject: Re: public hearing request for wood stove burn ban in Spokane County

Joanna,

I just wanted to let you know my email address is gclark@air-pipe.com, not gclark@sir-pipe. Sorry for my mistake.

Gloria Clark

From: [Ekrem, Joanna \(ECY\)](#)
Sent: Monday, March 09, 2015 3:55 PM
To: [Dan and Gloria Clark](#)
Subject: RE: public hearing request for wood stove burn ban in Spokane County

Gloria,
Thank you, I received your request for a public hearing. The public hearing will be held at 9:30 a.m. on April 2, 2015, at Spokane Regional Clean Air Agency office: 3104 E. Augusta Avenue, Spokane, WA 99207.
Joanna

Joanna Ekrem

| Air Quality Planner |
| WA State Dept of Ecology |
| Telephone 360.407.6826 |

From: Dan and Gloria Clark [<mailto:gclark@air-pipe.com>]
Sent: Monday, March 09, 2015 3:07 PM
To: Ekrem, Joanna (ECY)
Subject: public hearing request for wood stove burn ban in Spokane County

Dear Joanna Ekrem:

Please let this serve as notice that Spokane citizens would like to have a public hearing regarding a burn ban on wood stoves in Spokane County. Please write back to let me know that you got this email and the details of where and when a public hearing is going to be held. DOE's website said no public hearing would be held unless it was requested.

Sincerely,

Gloria Clark
Spokane CAPR Secretary
gclark@air-pipe.com

To DOE Air Quality Program
% of Joanna.ekrem@ecy.wa.gov

April 7, 2015

I attended the April 2, 2015 public hearing at the Spokane Regional Clean Air Agency (SRCAA) office with presenters from the Department of Ecology (DOE) and SRCAA. Joanna Ekrem of DOE stated that the Statewide Implementation Plan (SIP) for meeting the National Ambient Air Quality Standards (NAAQS) went into effect on September 14th, 2015. SRCAA's employee Margee Chambers of SRCAA stated that the purpose is to update solid burning device rules to align with state rules to call burn bans. The Spokane region has been in compliance with the National Ambient Air Quality Standards since 1996, so there is no need to update burn ban rules or comply with EPA's anti wood stove new emission rules.

First, SRCAA's own 2009 pamphlet titled Clean Healthy Air, shows a graph on page 2 that https://www.spokanecleanair.org/documents/our_air/Clean-Air-Brochure.pdf the Spokane region has NOT exceeded the National Ambient Air Quality Standards since 1995. The number of days we exceeded the NAAQS in 1980 was 107 days, in 1985, 51 days, in 1990, 31 days, in 1995, 4 days and since 1996 or the last 19 years, we have had 0 (ZERO) days in which we exceeded the NAAQS.

Second, at the hearing, I read from a wood stove bill (SHB 2326) that was passed by our state legislature in 2012 in the 62nd Legislature. I am especially alarmed over a portion of the bill which states on p. 6 that, "If the area is designated as a nonattainment area as of January 1, 2015, or required by the US EPA, the local air pollution control agency or the DOE may prohibit the use of uncertified devices. ...Prohibit the use or prohibition may include requiring disclosure of an uncertified device, removal, or rendering inoperable, as may be approved by rule by a local air agency or DOE. The effective date of such a rule may not be prior to January 1, 2015. "

The DOE and SRCAA made no mention at the public hearing that they could remove wood stoves and make them inoperable. Since, the Spokane region has met the National Ambient Air Quality standards since 1996 or 19 years, it appears to me

that Spokane citizens who use wood to heat their homes are already compliant with national standards. Thus, our Spokane citizens should not have to comply with new non-attainment state or EPA standards.

Third, rural citizens experience loss of electricity more often than city residents. Their wood stoves provide a sense of security to keep their families warm and supply heated food during frequent power outages. The new EPA standards would apply whether a person lives in a pristine region such as rural Alaska off the grid, or in a large city. EPA is obviously going after folks who use wood to heat their homes and their new rules make no logical sense.

In conclusion, SRCAA's pamphlet titled *Clean Healthy Air* states that our region has met National Ambient Air Quality Standards since 1996. It appears to me that DOE and SRCAA are wrongfully blaming wood stoves as polluters. But, we must face facts. Spokane's air is already in compliance with national standards. Just because EPA wants to outlaw 80 percent of wood stoves in America, our Spokane citizens already enjoy clean air and following EPA's ridiculous new rules will leave our citizens in the cold.

Gloria Clark

Lifetime Spokane Resident

From: Judy [mailto:jrcrowder@comcast.net]
Sent: Thursday, April 02, 2015 8:56 AM
To: ECY RE AQComments
Subject: State Implementation Revision

April 2, 2014
Spokane Regional Clean Air Agency
3104 E. Augusta
Spokane, WA

SUBJECT: April 2, 2015 Public Hearing: Spokane Proposed State Implementation Revision to Update Spokane Regional Clean Air Agency's Solid Fuel Burning Device Rules

Dear Department of Ecology,

The Federal government has grossly overstepped its constitutional bounds which the States enumerated in the U.S. Constitution at Article I Section 8. Without question there are 18 enumerated powers the Federal government can legally take charge of : **CLAUSE 1** To lay and collect Taxes, Duties, Imposts and Excises, and to provide for the Common Defense and general Welfare: **CLAUSE 2** To borrow Money: **CLAUSE 3** To regulate Commerce with foreign Nations, and among the several States, and with the Indian tribes: **CLAUSE 4** To establish a uniform Rule of Naturalization, and uniform Laws on the subject of Bankruptcies throughout the United States: **CLAUSE 5** To coin Money, regulate the Value thereof, and of foreign Coin, and fix the Standard of Weights and Measures:**CLAUSE 6** To provide for the Punishment of counterfeiting the Securities and current Coin of the United States: **CLAUSE 7** To Establish Post Offices and Post Roads: **CLAUSE 8** To promote the Progress of Science and useful Acts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries: **CLAUSE 9** To constitute Tribunals inferior to the supreme Court: **CLAUSE 10** To define and punish Piracies and Felonies committed on the high Seas, and Offenses against the Law of Nations: **CLAUSE 11** To declare War, grant Letters of Marque and Reprisal, and make Rules concerning Captures on Land and Water: **CLAUSE 12** To raise and support Armies, but no Appropriation of Money to that Use shall be for longer than two Years: **CLAUSE 13** To provide and maintain a Navy: **CLAUSE 14** To make Rules for the Government and Regulation for the lands and naval Forces: **CLAUSE 15** To provide for call forth the Militia to execute the Laws of the Union, suppress Insurrections and repel Invasions: **CLAUSE 16** To providing for organizing, arming, and disciplining, the Militia, and for governing such Part of them as may be employed in the Service of the U.S. reserving to the States respectively, the Appointment of the Officers, and the Authority of training the Militia according to the discipline prescribed by Congress: **CLAUSE 17** To exercise exclusive Legislation in all Cases whatsoever, over such District (not exceeding ten Miles square) as may, by Cession of particular States, and the Acceptance of Congress, become the Seat of the Government of the U.S., and to exercise like Authority over all Places purchased by the Consent of the Legislature of the State in which the Same shall be, for the Erection of Forts, Magazines, Arsenals, dock-Yards and other needful Buildings:--And: **CLAUSE 18** To make all laws which shall be necessary and proper for carrying into Execution the **foregoing** Powers, and all other Powers vested by this Constitution in the Government of the U.S. , or in any Department or Officer thereof. In addition to the above 18 enumerated and limited federal power, the states gave the Federal government the authority to make treaties at U.S. Const. Art. II sec.2, cl.2 and authority to dispose of land at U.S. Art. IV,sec 3, cl. 2.

Since the beginning of our country the Federal government has attempted to take powers it was not delegated and James Madison and Thomas Jefferson address the misuse of the general welfare clause to

gain unconstitutional power in the Kentucky and Virginia Resolutions of 1798. Kentucky Resolution Approved December 3rd, 1799 ;*“That if those who administer the general government be permitted to transgress the limits fixed by that compact, by a total disregard to the special delegations of power therein contained, annihilation of the state governments, and the erection upon their ruins, of a general consolidated government, will be the inevitable consequence:... That the several states who formed that instrument, being sovereign and independent, have the unquestionable right to judge of its infraction; and that a nullification, by those sovereignties, of all unauthorized acts done under colour of that instrument, is the rightful remedy:”*. Virginia Resolution Agreed to by the Senate, December 24, 1798 *“RESOLVED, That the General Assembly of Virginia, doth unequivocally express a firm resolution to maintain and defend the Constitution of the United States, and the Constitution of this State, against every aggression either foreign or domestic... That this Assembly doth explicitly and peremptorily declare, that it views the powers of the federal government, as resulting from the compact, to which the states are parties; as limited by the plain sense and intention of the instrument constituting the compact; as no further valid that they are authorized by the grants enumerated in that compact; and that in case of a deliberate, palpable, and dangerous exercise of other powers, not granted by the said compact, the states who are parties thereto, have the right, and are in duty bound, to interpose for arresting the progress of the evil, and for maintaining within their respective limits, the authorities, rights and liberties appertaining to them.... That the General Assembly doth also express its deep regret, that a spirit has in sundry instances, been manifested by the federal government, to enlarge its powers by forced constructions of the constitutional charter which defines them; and that implications have appeared of a design to expound certain general phrases (which having been copied from the very limited grant of power, in the former articles of confederation were the less liable to be misconstrued) so as to destroy the meaning and effect, of the particular enumeration which necessarily explains and limits the general phrases; and so as to consolidate the states by degrees, into one sovereignty, the obvious tendency and inevitable consequence of which would be, to transform the present republican system of the United States, into an absolute, or at best a mixed monarchy.”*

The U.S. Constitution does not give the EPA the power to dictate anything in regard to States air or our ability to heat our homes with the God given abundant energy source provided by our forests. To require us to heat our homes with a source that is controlled by a third party is a taking of property rights and our ability to live independently as freemen.

The very purpose of the State government is to protect individual rights as stated in Article I Section 1 of the Washington State Constitution *“All political power is inherent in the people, and governments derive their just powers from the consent of the governed, and are established to protect and maintain individual rights.”* In the Northwest without heat a family cannot survive thus a monopoly on the source of heat which can legally be used is the taking of one’s individual right to live on ones land year round. Article 1 Section is even clearer on this issue, *“No person shall be deprived of life, liberty or property, without due process of law.”* If the State government deprives a person the right to use the wood of their land to heat their homes and force them to use what today has become a local monopoly on electricity or gas they have in fact deprived the people of their liberty and property making use of their property dependent on a third party. In an emergency when the electricity is taken out it could conceivably deprive them of life. My young family experienced 6 days without power in the Spokane County ice storm and without our fireplace we would have been forced out of our home. Americans should enjoy freedom from dependency.

The Clean Air Act has no constitutional authority to require states develop a general plan to attain and maintain the [National Ambient Air Quality Standard](#) (NAAQS) and no power to interfere with a State Implementation Plan.

According to your air quality brochure found at: [www.spokanecleanair.org/documents/our air/Clean-Air-Brochure.pdf](http://www.spokanecleanair.org/documents/our_air/Clean-Air-Brochure.pdf)

the air quality in Spokane had not exceeded the National Air Quality Standard since 2000. As a State agency perhaps a more regional county by county approach is warranted and the counties with a air quality problem could look for solutions to minimize air pollution without taking the people's right to heat their homes is the way they choose.

Blessings in Liberty,

Judy Crowder
20135 N. Yale Rd.
Colbert, WA 99005

From: jrcrowder@comcast.net [mailto:jrcrowder@comcast.net]
Sent: Friday, April 10, 2015 10:31 AM
To: ECY RE AQComments
Subject: Comment SRCAA Reg I Art.VIII Solid Fuel Burning Devices Rule

April 10, 2015

Spokane Regional Clean Air Agency
ATTN: Margee Chambers
3104 E. Augusta Avenue
Spokane, WA 99207

RE: Comments on Public Draft, March 2015 Updates to SRCAA Solid Fuel Burning Devices Rule (Reg. I Art. VIII)

Dear SRCAA,

I believe government closest to the people is best and that is why the American system has been so successful allowing the checks and balances of Local, County, State and Federal governments with the planned decentralization of power. Spokane Regional Clean Air Agency should follow the WASHINGTON CLEAN AIR ACT RCW CHAPTER 70.94 and should not be obligated to national standards.

The U.S. Constitution does not give the Federal government or it's agency any power over the air quality in the States and the State is correct to limit EPA control over the clean air policies of State policy.

In fact RCW 70.94.230 specifically outlines who has authority to make rules and it does not mention any national agency. The local agencies are to follow rules made by the Authority "*The rules and regulations hereafter adopted by an authority under the provisions of this chapter*". The authority is defined RCW 70.94.030 (5) and is not the EPA. Other areas of the State law which concern our local air quality are RCW 70.94.450 Woodstoves-Policy , RCW 70.94.456 Woodstoves – Definitions, RCW 70.94.455 , RCW 70.94.457 Solid fuel burning devices – Emission performance standards and WAC 173-433-100 EMISSION PERFORMANCE STANDARDS. The State has adopted rules for when advisory alerts and burn bans maybe called RCW 70.94.473 which list the level necessary to began the burn ban process. That is not the same as saying that is the annual or 24 hour standard for the State of Washington.

Control of the Standards for our air quality are and should be established by the State. It is the intent of the State to comply with the requirements of the federal clean air act

however the legislator's did not directly tie the State air quality standards to the EPA standards. (RCW 70.94.011)

The State has maintained control over the clean air policy in Washington State and has used CFR Title 40 Part 60 & 61 national regulations to provide the standard of testing methods and to provide the list of contaminates considered as pollutants. CFR Part 60 for testing standards and Part 61 for air pollutants. The State has adopted rules for when advisory alerts and burn bans maybe called RCW 70.94.473 which list the level necessary to began the bun ban process. That is not the same as saying that is the annual or 24 hour standard for the State of Washington.

One of the main goals SRCAA listed on page one of the Public Review Draft, March 20155 is to meet EPA air quality requirements. I strongly believe that should be changed to Washington State air quality requirements. I am requesting you not submit the Spokane Regional Clean Air Agency (SRCAA) State Implementation Plan (SIP) to EPA for approval as your letter included in the Public Review Draft of Feb 25, 2015 is suggesting.

I have attached a excel spread sheet of the history of the record of Spokane County and I commend the people of Spokane and your agency for making it possible that we have never exceeded the PM2.5 microgram National Annual Standard and have only twice exceeded the Annual National Annual PM10 micogram standard in 1987 & 1988. I believe those exceedent years were years of Northwest fires and I know 1988 was the year of the Yellowstone fires. As we go down the path of cleaner and cleaner air we must balance the citizen's rights to use natural resources on their land and their right to remain independent of third party energy providers.

I recommend (red is your suggested changes):

SECTION 8.03 – DEFINITIONS

Do not add (I) National Ambient Air Quality Standards (NAAQS; 40 CFR 50) means outdoor air quality standards established by the United States Environmental Protection Agency under authority of the federal Clean Air Act. EPA set standards for six principal air pollutants, called "criteria" pollutants, under the NAAQS. The criteria pollutants are carbon monoxide, sulfur dioxide, nitrogen dioxide, lead, ozone and particulate matter (PM2.5 and PM10).

Do not add (K) Nonattainment Area means a clearly delineated geographic area which has been designated by the Environmental Protection Agency because it does not meet, or it affects ambient air quality in a nearby area that does not meet, a national ambient air quality standard or standards for one or more of the criteria pollutants defined in 40 CFR 50, National Ambient Air Quality Standards.

SECTION 8.04 - EMISSION PERFORMANCE STANDARDS

Remove existing language with reference to National Air quality Standards and replace section to read: **Add:** The Agency adopts RCW 70.94.457 and WAC 173-433 by reference " Emissions Performance Standards.

SECTION 8.09 - PROCEDURE TO GEOGRAPHICALLY LIMIT SOLID FUEL BURNING DEVICES

Do not add :(A) If the EPA finds that the Spokane PM10 Maintenance Area has violated a National Ambient Air Quality Standard for PM10 and After July 1, 1995, if the EPA finds that the Spokane PM10 Nonattainment Area, as defined in CFR Title 40, Part 81, has either: 1. failed to make Reasonable Further Progress, or 2. failed to timely attain a National Ambient Air Quality Standard for particulates ten microns and smaller in diameter (PM10), as defined in CFR title 40, Part 50.6, or 3. violated a National Ambient Air Quality Standard for PM10 after redesignation as an attainment area, emissions from solid fuel burning devices are determined by the EPA, in consultation with Ecology and the AuthorityAgency, to be a contributing factor to such failure or violation, then one year after such determination, the use of solid fuel burning devices not meeting the standards set forth in RCW 70.94.457 and WAC 173-433-100, is restricted to areas outside the Smoke Control Zone.

Do add: (A) If the Spokane is outside the Washington State guidelines for air quality and has failed to make Reasonable Further Progress, or failed to timely attain State Ambient Air Quality Standards for particulates ten microns and smaller in diameter (PM10), as defined in CFR title 40, Part 50.6, then one year after such determination, the use of solid fuel burning devices not meeting the standards set forth in RCW 70.94.457 and WAC 173-433-100, may be restricted to areas outside the Smoke Control Zone.

Blessings in Liberty,

Judy Crowder
20315 N. Yale Rd
Colbert, WA 99005
509-238-9430

Attached: excel spread sheet on history of SRCAA exceedences
cc. DOE

Spokane County Historical Burn Bans

| | PM10 Annual EPA Compliance | PM2.5 Annual EPA Compliance | PM2.5 exceeded in 24 hour | SPK Bans | **SPK stage 1 | ***SPK stage 2 | *SPK forecast |
|------|----------------------------|-----------------------------|--|----------|---------------|----------------|-------------------------|
| 1974 | YES | NA | | 0 | | | 13 |
| 1975 | YES | NA | | 0 | | | 4 |
| 1976 | YES | NA | | 0 | | | 8 |
| 1977 | YES | NA | | 0 | | | 16 |
| 1978 | YES | NA | | 0 | | | 2 |
| 1979 | YES | NA | | 0 | | | 7 |
| 1980 | YES | NA | | 0 | | | 4 |
| 1981 | YES | NA | | 0 | | | 12 |
| 1982 | YES | NA | | 0 | | | 3 |
| 1983 | YES | NA | | 0 | | | 4 |
| 1984 | YES | NA | | 0 | | | 0 |
| 1985 | YES | NA | | 0 | | | 19 |
| 1986 | YES | NA | | 0 | | | 10 |
| 1987 | NO | NA | | 0 | | | 8 |
| 1988 | NO | NA | | 0 | | | 10 |
| 1989 | YES | NA | | 8 | 8 | | 6 |
| 1990 | YES | NA | | 8 | 2 | | |
| 1991 | YES | NA | | 6 | 6 | | |
| 1992 | YES | NA | | 4 | 4 | | 1 |
| 1993 | YES | NA | | 20 | 17 | 3 | 14 |
| 1994 | YES | NA | | 19 | 19 | | |
| 1995 | YES | NA | | 6 | 6 | | |
| 1996 | YES | NA | | 6 | 6 | | |
| 1997 | YES | NA | | 1 | 1 | | |
| 1998 | YES | YES | | 3 | | 3 | 1 1 forecast no ban |
| 1999 | YES | YES | | 0 | | | |
| 2000 | YES | YES | | 3 | 3 | | 6 5 forecast no ban |
| 2001 | YES | YES | | 0 | | | |
| 2002 | YES | YES | | 16 | 16 | | 3 3 forecast no ban |
| 2003 | YES | YES | | 13 | 13 | | 3 3 forecast no ban |
| 2004 | YES | YES | | 2 | 2 | | |
| 2005 | YES | YES | | 10 | 10 | | 20 20 no ban |
| 2006 | YES | YES | | 8 | 8 | | 5 5 ASA w/ban |
| 2007 | YES | YES | | 6 | 6 | | |
| 2008 | YES | YES | | 0 | | | 6 |
| 2009 | YES | YES | | 0 | | | 17 |
| 2010 | YES | YES | 12-31-2010 36.3 mass concentration | 0 | | | |
| 2011 | YES | YES | | 20 | 19 | 1 | 1 1 ASA no ban 18 w/ban |
| 2012 | YES | YES | 9-15-2012 39.8 mass concentration 9-20-2012 39.1 mass concentration | 11 | 11 | | 11 11 ASAw/ ban |
| 2013 | YES | YES | 11-24-2013 38.4 mass concentration | 12 | 7 | 5 | 12 12 ASA w/ban |
| 2014 | YES | YES | 7-10-2014 37.0 mass concentrations | | | | |
| 2015 | YES | YES | 7/18/2014 36.3 mass concentrations | | | | |

*forecasted meteorological conditions are predicted to reach or exceed 30 micrograms per cubic meter within forty-eight hours
 **Stage 1 Ban = forecasted meteorological conditions are predicted to reach or exceed 30 micrograms per cubic meter within forty-eight hours forecasted meteorological conditions are predicted to reach or exceed 30 micrograms per cubic meter within forty-eight hours
 *** Stage 2 Ban= stage one met and forecasted meteorological conditions are predicted to reach or exceed 30 micrograms per cubic meter within forty-eight hours.
 NOTE: PM2.5 began in 1997 and is a subcategory of PM10. 1997 65 microns §50.7 Currently National primary and secondary ambient air quality standards for PM2.5. a/o 4-8-2015 remains at 65 µg/m3 24-hour average concentration measured in the ambient air as PM2.5

?Fire Year
 Year of the Yellowstone fire

Starting using ASA (forecast alert)
 PM2.5 went to 35 microns from 65

?Methow Valley fires
 ?Methow Valley fires

From: Lester Lea [<mailto:lesterlea@gmail.com>]
Sent: Wednesday, April 08, 2015 3:49 PM
To: Ekrem, Joanna (ECY)
Cc: Shea Matt
Subject: Wood stoves

I do not approve of these unnecessary changes to air standards in Spokane County that will infringe on my private property rights guaranteed under the U.S. Constitution and the Constitution of the State of Washington."
Lester Lea

Sent from my iPhone

From: -Y- [<mailto:lizard@use.startmail.com>]

Sent: Wednesday, April 08, 2015 4:12 PM

To: Ekrem, Joanna (ECY)

Subject: wood stove ban

Joanna good day,

I do not approve of these unnecessary changes to air standards in Spokane County that will infringe on my private property rights guaranteed under the U.S. Constitution and the Constitution of the State of Washington.

We appreciate SRCAA's effort to update the policy and propose it to EPA which would appear to make more sense and be better for the public, but we do not approve of the idea. We highly suggest and ask that you and the team really look beyond the horizon here and see what's happening. We too are people who are in need of paychecks but we do not compromise. If you're in the position to select compromise or losing your position, we strongly encourage you all to seek companies that do not bow under tyranny.

Thank you for hearing us out.

Regards,

-Liz-
Spokane County

From: Marilyn Montgomery [<mailto:marilynj35@gmail.com>]

Sent: Wednesday, April 08, 2015 6:39 PM

To: Ekrem, Joanna (ECY)

Subject: DOE/SRCAA "UPDATE" OF SPOKANE REGION'S AMBIENT AIR QUALITY STANDARDS

At your April 2nd Public Hearing in Spokane which I attended, SRCAA's employee Margee Chambers stated that the purpose of the Statewide Implementation Plan is to update solid burning device rules to align with state rules to call burn bans. It is my understanding that the Spokane region has not exceeded the National Ambient Air Quality Standards since 1995, and therefore it is nonsensical - and ridiculously restricting - to proceed with increasing the non-attainment standards when Spokane hasn't exceeded them in 19 years!

Is my understanding correct that the EPA may force homeowners to physically block up their fireplaces "permanently" and remove their wood stoves, and - for heaven's sake! - forbid all citizens from barbecuing if the standards are not met? Such restrictions are draconian and would deny families from the natural enjoyment of their homes, reducing our beloved amenities that help make life worthwhile. Do I also understand that our neighbors are called upon to "snitch" on anyone whom they think may be contributing to non-attainment? That is just Orwellian! There are many families who use wood exclusively to heat their homes, and even many more who partially heat their homes with wood when inclement weather takes hold. They do not need the stress of these new restrictions with the threat of censure and fines, and perhaps the mandate that they replace their stove with a much more expensive one in order to "comply."

For the record, I do not approve of these absolutely unnecessary changes to air standards in Spokane County, standards that will infringe on my and my neighbors' private property rights guaranteed under both the Constitution of the State of Washington and the Constitution of these United States.

Respectfully submitted,

Marilyn J. Montgomery
4715 East Sumac Drive
Spokane, WA 99223-2210
509-448-5288

From: Mary jo King [mailto:behappymj@icloud.com]
Sent: Saturday, March 21, 2015 7:09 PM
To: Ekrem, Joanna (ECY)
Subject: Fireplace Ban in Spokane County

Hello Joanna...

I hope you are having a nice day.

Could you please explain what the hearing is about in Spokane Wa on April 2nd and what the Department of Ecology is proposing to do in Spokane County?

Are there bans being proposed permanently for residential fireplaces in Spokane County and is it only for the county? Does this include Spokane city as well?

Thank you so much for responding and explaining what this hearing is about and exactly what you are proposing to do.

Thank you so much for your help..

Mary Jo King

Sent from my iPhone

From: Mary Jo King [mailto:behappymj@gmail.com]
Sent: Tuesday, March 24, 2015 10:03 PM
To: Ekrem, Joanna (ECY)
Subject: Wood Burning Fireplaces in Spokane County

Dear Joanna ...

I hope you are having a great day!!

I apologize if you have received a couple of emails from me - I can't tell if you are receiving them. So I am sending one from my email so I know it gets sent. Thanks so much.

I am writing in regards to some proposals about banning wood burning fireplaces in Spokane County or very severe restrictions? There is a hearing on April 2nd about this.

I was just wondering if you could clarify what this meeting is about and what The Department of Ecology is proposing for the residents of Spokane County? I have received no flyers or information about this from The Department of Ecology.

I will look forward to hearing from you.

Thanks so very much.

Mary Jo King

--

Mary Jo King

"Be happy..it is one way of being wise"..

"No act of kindness, no matter how small, is ever wasted." Aesop

From: Patsi Marie [<mailto:swimgal4@msn.com>]
Sent: Wednesday, April 08, 2015 5:17 PM
To: Ekrem, Joanna (ECY)
Subject: Woodstove Burning in Spokane

For hundreds of years people have burned wood in their homes. It is our right to enjoy our home. To remove one more infringement upon our rights granted by the constitution is despicable. Large mills & casinos can omit whatever comes out their chimney stacks ... It's always the small guy who is under siege. Our incinerator can't be without some stink but let's hush that up:) Empty city buses omit plenty of awful diesel fumes & the wealthy who burn in their oval shaped fire pits are not a problem. But let's get Granny away from that stove & turn up that electric or gas (AVISTA NEEDS YOU)

Patricia Dunham
Sent from my iPhone

From: Appy Holadays Sport Horses [mailto:mrromantico@earthlink.net]
Sent: Thursday, March 19, 2015 7:10 PM
To: Ekrem, Joanna (ECY)
Subject: Re: Dept. of Ecology: Spokane Wood Stove Burn Ban Hearings on April 2

Joanna Ekrem,

I don't know if you have had the formal request for this hearing sent to you yet, but if not, I am formally requesting a hearing for the 2nd of April with this email response. This rather hidden notice to the public is grossly inadequate for such an extremely important issue. Something of this magnitude should be announced as an ALERT on the evening news, morning news, and in every newspaper in the entire State.

This subject on "woodstoves" and the banning of them in any way, shape, or form, is the equivalent to a gun ban, a property rights ban, or a water usage ban, and don't think for a minute it is anything of less importance than those other things. You are talking about cutting into, or completely cutting out, a part of "the bare essentials necessary for human life" in our State. We are not Arizona... in case the DoE has failed to notice that important fact.

Nobody over here is going to allow any sort of a woodstove ban or partial woodstove ban to be enforced in this state, and furthermore, the people even thinking of pushing this idea are completely insane. So in other words, yes, we absolutely want a hearing.

Rene' Holaday

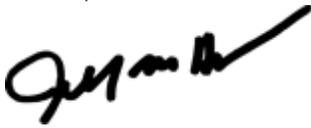
President, Stevens County CAPR

From: Holy, Rep. Jeff [mailto:Jeff.Holy@leg.wa.gov]
Sent: Thursday, March 19, 2015 8:37 AM
To: Ekrem, Joanna (ECY)
Subject: FW: URGENT ALERT: Spokane Wood Stove Burn Ban Hearings on April 2 (Please Forward)
Importance: High

Joanna,

Keep me in the email loop as to any change in state standards or Spokane County local rules resulting from these hearings.

Thanks,

A handwritten signature in black ink, appearing to read "Jeff Holy", with a long, sweeping flourish extending to the right.

Rep. Jeff Holy
6th Legislative District
360-786-7962

Visit my website [here](#).

From: Stephen Dunham <sdunham@q.com>
Date: April 9, 2015 10:44:12 PM PDT
To: Joanna.ekrem@ecy.wa.gov
Subject: Proposed SIP Revision Comment

I would like to make a few comments about the proposed SIP revision. First, The SIP does not have to be submitted to the EPA for approval and Washington State does not have to meet EPA requirements for national air quality. The EPA is an unconstitutional agency that Congress created in the 1970's. Article I Section 8 of the Constitution lists the only specific government expenses for which it has the power to tax. Protecting the environment, regulating air quality, and restricting the use of wood stoves are not on this list. The tenth amendment to the Constitution states "The powers not delegated to the United States, nor prohibited by it to the States, are reserved to the States or to the people. In other words it is up to the States or the people to regulate the environment not the federal government. In the Kentucky Resolution of 1799 Thomas Jefferson called nullification the "rightful Remedy" for any and all unconstitutional acts of the federal government. Nullification is founded on the fact that the sovereign States formed the union, and as creators of the contract, they retain ultimate authority to enforce the constitutional limits of the power of the federal government. Simply stated nullification recognizes each state's reserved power to nullify, or invalidate, any federal measure that a state deems unconstitutional. Over the years many states have nullified unconstitutional federal laws in the areas of gun control, ObamaCare, NSA surveillance, and national ID cards. The article from the New American below tells how in Alaska

local politicians attempted to regulate wood burning to comply with EPA requirements. The residents of Fairbanks passed a citizen initiative that nullified the implementation of the regulations on wood burning. They said they would rather not freeze to death to satisfy federal bureaucrats. This nullification of unconstitutional EPA regulations should be done in Spokane, the State of Washington and all across the country. SRCAA has the job of enforcing the EPA's unconstitutional regulations which makes many of their activities such as running around town spying on people and levying fines illegal and unlawful under our Constitutional form of government. Second, The Dept. of Ecology flyer we were given at the meeting on April 2nd states that the EPA sets national air quality standards for six common pollutants. One of those six is human breath (CO₂) . Yes the totally out of control EPA under the clean air act has established CO₂ as a regulatory "pollutant " even though all plants need CO₂ for photosynthesis and all animals exhale carbon dioxide. About 8% of man made worldwide CO₂ emissions are due to simple human breathing. The EPA says they do not want to regulate our breathing...for now. The excuse for the EPA's need for regulatory powers to limit CO₂ is the "threat" of global warming. About 186 Billion tons of CO₂ enters the atmosphere every year. Only 3.3% is from human activity. 57% is given off by oceans and 38% is breathed out by animals. In other words if you take out the 8% that humans breath out from the 3.3% of total CO₂ from human activity you end up with about 3%. So if we eliminated all cars and trucks , all wood burning, all coal burning etc. we would reduce only 3%

of the CO2 that enters the atmosphere every year hardly enough to effect global warming or cooling. Modern commercial greenhouses often use CO2 generators to increase the daytime CO2 content to 1,000 ppm or higher for optimum plant growth. Our atmospheric CO2 content now of 400 ppm is hardly dangerous. Higher CO2 levels lead to bigger crops and more food . In 2007 Al Gore publicly warned the North Pole would be ice free in the summer by around 2013 because of alleged man made global warming. Instead of melting, sea ice worldwide is at the highest levels since records began. The RSS (Remote Sensing Systems) set of global satellite temperature data report that the period WITHOUT global warming has now been extended to 18 years and three months, stretching back to October of 1996. This fact of global cooling makes us ask why the EPA is so intent on further limiting CO2 emissions and restricting the use of wood stoves when the science is simply not there to support their actions.

Finally, I believe the EPA and sadly our local SRCAA is being used much like the IRS as a tool of the federal government to intimidate, control,tax and regulate the American people in an effort to take away our freedoms and property rights. I totally agree with the bumper sticker that says , "Eliminate the EPA, It's Them or Us."

Please read the article below. Thank you

Steve Dunham 1616 S. Milton Spokane Wash. 99224

<http://www.thenewamerican.com/tech/environment/item/14016-just-freeze-epa-says-burning-wood-is-bad-but-so-is-natural-gas-coal-oil>

From: Steven DePiro [mailto:depirost@gmail.com]
Sent: Thursday, April 09, 2015 12:18 PM
To: ECY RE AQComments
Subject: Leave My Wood Stove Alone Please

Myself and every neighbor and Friend I have talked to regarding wood stove bans are against any regulations on wood stoves that you may be proposing.
Cattle Feed lots and cars/trucks are culprits, not wood stoves.

Thank you.

--

Steven DePiro
Office 509-891-3635
Cell 360-420-1332
17224 Offmy Lane
Spokane, WA. 99217

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From: Sue Lani Madsen [mailto:suelani.madsen@gmail.com]
Sent: Sunday, March 22, 2015 7:33 PM
To: Ekrem, Joanna (ECY)
Subject: Hearing Request for Update of Clean Air Plan for Spokane County

Per the Joint News Release dated March 2, 2015 I hereby request a public hearing and am sending this request prior to the March 23rd deadline for receipt of such a request (just in case no one else made the request). See you at 9:30am on Thursday, April 2nd at the SRCAA offices on August Avenue.

--

Sue Lani Madsen
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*"He has showed you, oh man, what is good; And what does the Lord require of you but to do justice, and to love kindness, and to walk humbly with your God."
--Micah 6:8*

The proposed Clean Air Plan for Spokane County allows air quality managers to issue burn bans at a lower threshold to help improve overall air quality. It also contains updated criteria for individuals to obtain an exemption to use solid-fuel burning devices during a burn ban.

The Burn Ban trigger was revised from PM10 to the more stringent PM2.5 standard?
(Burn Ban - CFR Title 40, Part 50, Appendix L)

This is 300% more stringent than what has been in place for years - even prior to 1997 - as a Federal Standard, I assume this regulation is the same as used in highly populated American cities?

How often over the past several years has a Stage 2 Burn Ban been reached in Spokane County? Eastern Washington? Western Washington?

How many times last year was a Stage 2 Burn Ban reached? (with the new PM2.5)

Considering the importance of this subject upon those that heat with wood it seems unlikely my question has not been discussed and draws the question as to why you not prepared to answer it.

The process by which we came together tonight is an ongoing circle:

The (WikiLeaks Document) Congressional Research Service Report 97-722; **Air Quality Standards: The Decisionmaking Process** states:

"The (Clean Air Act) Act requires EPA to revisit each NAAQS every 5years, following the same process" (which can change due to new science)