

Ms. Dorothy Shimer  
Research Division, 5<sup>th</sup> Floor  
Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

Dear Ms. Shimer:

RE: Comments on Draft Indoor Air Quality Report, AB 1173 (Keeley)

The Vent-Free Gas Products Alliance respectfully provides the following comments on the draft Indoor Air Quality Report A.B. 1173 (Keeley). The Vent-Free Gas Products Alliance is a coalition of 15 members of the Vent-Free Gas Products Division of GAMA, a 69 - year old national trade association of gas, oil and electric products used for space heating and water heating and related components and accessories. Our comments relate to vent-free supplemental gas heating products, which are certified to ANSI Z21.11.2 and incorporate an Oxygen Detection Safety Pilot in each unit.

There have been over 15 million units of vent-free gas products installed in U.S. homes since 1980. All of the states, with the sole exception of California, permit the sale and installation of these products. The safety record of these supplemental gas heating units is outstanding as there has never been a documented death attributed to emissions from these products which are equipped with an Oxygen Detection Safety-Pilot or ODS. Further, two peer reviewed, independent research studies conducted between 1996 – 2004 confirm that trace emissions from these products are well below the most recognized and relevant indoor air quality guidelines. These extremely low emissions were verified even where the products were oversized for the space and operated for extended periods of time.

All vent-free gas products are safety and performance certified by third party testing agencies for compliance with the applicable national safety standard. As previously stated, they perform well within recognized guidelines and recommendations for indoor air quality. For instance, the level of NO<sub>2</sub> is one-half that recommended by OSHA for space shuttles and submarines (0.5 ppm for an 8-hour average). Effective in March 2005, ANSI Standard Z21.11.2 will restrict NO<sub>2</sub> emissions to a maximum 20 ppm air-free. This value is based upon a Consumer Product Safety Commission (CPSC) recommendation of 0.3 ppm for a one-hour average in ambient air in order to “minimize the occurrence of adverse responses for sensitive individuals.”

These products provide an excellent source of supplemental heat and we ask that this report recommend a new review of regulations to permit vent-free use as authorized by California Senate Bill 798, which was passed and signed by the Governor in 1998. However, since California regulations to permit the use of vent-free gas appliances have never been implemented, the products cannot be installed in the State of California. Unless the report recommends a new review of the regulations to permit the products, we than see no point why the CARB report should even mention these vent-free supplemental gas heating products. We suggest that all discussion of these products in the report be deleted.

Attached to these comments is a copy of the American Gas Association Research Laboratories (AGAR) independent study on indoor air quality. AGAR was the research arm of the International Approval Services (IAS), which is now CSA located in Cleveland Ohio.

Also enclosed is a copy of the independent research titled *Impacts of Vent-Free Gas Heating Products on Indoor Relative Humidity*. This rigorous and comprehensive study was completed in December 2002 by risksciences, LLC, an independent scientific consulting firm nationally recognized for its expertise in human exposure modeling in residential environments. The research study concluded:

For the vast majority of homes in the U.S., vent-free gas heating products do not generate enough water vapor to raise indoor humidity levels high enough to foster mold growth.

A copy of the *Consumer Guide to Vent-Free Gas Products* is also enclosed. This guide can be found at [www.vantfree.org](http://www.vantfree.org) and click on Consumer Guide to Vent-Free Gas Products.

Thank you for the opportunity to state our concerns with the proposed regulations. I can be reached at (703) 525-7060 X 240 or [mcarson@gamanet.org](mailto:mcarson@gamanet.org) if staff has questions regarding our comments.

Sincerely yours,

Mary S. Carson

Program Director  
Vent-Free Gas Products Alliance