

August 16, 2004

Dorothy Shimer
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Air Resources Board
P.O. Box 2815
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**RE: Comments on Draft Indoor Air
Quality Report, AB 1173 (Keeley)**

The Gas Appliance Manufacturers Association (GAMA) is a 69-year old national trade association of manufacturers of gas, oil and electric products used for space heating and water heating and related components and accessories. GAMA's membership includes nearly all U.S. manufacturers of residential and commercial furnaces, boilers and water heaters, as well as manufacturers of vented and unvented gas space heaters.

The health and safety of users of gas appliances is of paramount importance to GAMA and the industries it represents. Since its founding in 1935, GAMA has been involved in the development and updating of comprehensive and effective voluntary national safety standards for gas appliances and equipment. The gas products manufactured by GAMA member companies have all been certified by recognized third party testing agencies as being in compliance with applicable national safety standards.

It is GAMA's position that gas appliances should be installed by a qualified professional and regularly maintained in accordance with the manufacturer's instructions. We support annual inspection of gas appliances by a qualified professional to ensure their continued safe performance.

The CARB report states at page 14 that the most effective approach for preventing or reducing indoor air pollution is to use products and appliances that emit little or no air pollution. When installed and used in accordance with the manufacturer's instructions, all of the gas-fired products we represent fit this description. Since installation of unvented gas space heaters is not permitted in California residences, our comments will focus mainly on vented appliances. The national safety standards for vented gas appliances prescribe very strict limits on the amount of carbon monoxide such appliances may produce, and gas appliances typically perform better in this regard than the standard allows. When these products are properly vented, no carbon monoxide enters the living space.

Later, at page 16, the CARB report states: "Gas and propane appliances could be improved to emit lower levels of pollutants, and paired with active exhaust ventilation features or safety devices to assure exposure reduction." One of the problems with this and many other statements made in this report about gas appliances is that all types of gas products are lumped together. With regard to the products we represent, statements like this are inapposite. For example, active exhaust ventilation clearly does not pertain to a vented appliance. Again, national safety standards already limit the CO emissions of vented gas appliances and, since these products are vented, no CO enters the home in any case. Additionally, the NOx emissions of furnaces, boilers and water heaters are already regulated by the various air quality management districts in California.

For the vast majority of consumers, their gas furnace or water heater is no threat to them whatsoever. When a problem does occur, it is not because the furnace or water heater is “poorly tuned” (see CARB report at page 44), but because the venting system has been installed incorrectly, is blocked or is no longer intact. That is one of the reasons we encourage annual inspections—to verify the integrity of the venting system. Instances of vent failure have to be addressed, but public education – not further government regulation – is the best way to reduce the frequency of such occurrences.

We are also concerned that CARB staff may not fully appreciate the product cost impacts of more stringent regulation of product emissions. On page 14, the report states: “Low emission product designs or reformulations can usually be accomplished by the manufacturer, with minimal impact to the consumer, often with only minor increased costs.” This statement is unsubstantiated and certainly does not reflect the experience of the industries we represent. As an example, GAMA’s Water Heater Division is currently working cooperatively with the California South Coast Air Quality Management District in helping to improve California’s air quality through further reductions in NOx emissions, while maintaining safe and effective products. The water heater industry will likely spend tens of millions of dollars to redesign its products to meet more stringent technology-forcing standards. It is important to note that those increased costs will ultimately be borne by the consumer.

As previously noted, GAMA’s membership includes manufacturers of unvented gas space heaters. These products are also safety-certified by third party testing agencies for compliance with national safety standards. They have an excellent safety record and they perform well within nationally recognized guidelines for indoor air quality. These products are now accepted for sale and installation in every state in the country except California. Since it is already unlawful for these products to be sold or installed in California, we see no point why the CARB report should even mention these products. All discussion of these products in the report should be deleted.

Thank you for the opportunity to share GAMA’s concerns with the proposed regulations. I can be reached at (703) 525-7060, ext. 230 or jmattingly@gamanet.org if staff has questions regarding our comments.

Sincerely,

Joseph M. Mattingly
Vice President and General Counsel
Gas Appliance Manufacturers Association