

Episode 56GZ August 7,2023. Tacoma Chokes, U K's PM2.5 from wood stoves, Texas' One Mile Rule in favor of Industry pollution.

Washington, Tacoma

RAWSEP View: This editorial asking for attention to be paid to marginalized communities affected by wildfire smoke is of interest to Residents Against Wood Smoke Emission particulates because it describes the adverse health effects of all wood burning. Also, some see and even experience the adverse health effects of Canadian wildfire smoke invading parts of the United States in the last two months do not make the connection between all types of wood smoke causing adverse health effects. Coverage of the Canadian wildfire incursion into the United States on online media, TV news and even newspapers still distributed in paper form do have some effect on public education and sending persuasive messages to the average person asking them to pay attention to pollution from wood burning. Near neighbors of indoor residential wood burners are still canaries in a coal mine, the first affected because they are the closest, in a hyper-localized place, to a source of wood burning air pollution that other people may not sense through sight, smell, taste, or touch because those people are farther away. That is why hyper-localized PM2.5 monitors in the yards of near neighbors of indoor residential wood burners are essential in regulating the PM2.5 pollution from indoor residential wood burning. E P A \$100,000 PM2.5 monitors are put up near industrial facilities, usually not in residential neighborhoods where hyper-localized indoor residential wood burning occurs, emitting particulate matter of 2.5 micrometer size, the perfect size to infiltrate the human lung, setting off a cascade of human health problems and early deaths, primarily for near neighbors to begin with, like canaries in a coal mine. Will the public pay attention to the canaries in a coal mine, or will smoke have to fill the whole cave and bring down all who are in the cave, before attention is paid. The message about the harm to human health from indoor residential wood burning needs to be put out there. This editorial says that we cannot rely on mainstream media to do this in an effective way yet.

Washington, Tacoma, Editorial

[The Northwest is choking on wildfire smoke. Residents deserve better national coverage | Opinion](#)

Yahoo Sports

... in 2018, I'd never experienced wildfire smoke, but in September 2020, I vividly remember stepping outside to the smell of burning wood and the ...

The Northwest is choking on wildfire smoke. Residents deserve better national coverage | Opinion
August 6, 2023.

Before moving to Tacoma, Washington, in 2018, I'd never experienced wildfire smoke, but in September 2020, I vividly remember stepping outside to the smell of burning wood and the taste of ash.

Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates.

A thick orange haze had settled over my neighborhood, a smoky blanket suffocating life. The two HEPA air filters I purchased on a whim worked overtime to filter the air inside my home. Cleaning them required the removal of a slick, grimy film that filled me with disgust. People were breathing this. Now, in 2023, smoke events are familiar during wildfire season in the Pacific Northwest and, (now) across the country. The Tunnel 5 fire, which has burned more than 500 acres in southern Washington, threatens homes and businesses here. The untold health burden from wildfire smoke, is particularly on socially marginalized communities. Wildfire smoke, laden with harmful particulates, takes a toll on our health. Its harms include respiratory distress, exacerbation of heart conditions, and premature death. The effects these wildfires have on our health also amount to billions of dollars in costs for both Washington and Oregon. Despite numerous studies showing wildfire smoke contributes to public health problems, what's missing are discussions of **who bears the brunt of this burden**. A Media Matters analysis found that national TV news shows aired a combined 9 minutes of coverage about the heat wave that scorched the Pacific Northwest in May. **None of them mentioned climate change**. During more than 3 ½ hours of national TV news coverage on June 7 of the Canadian wildfire smoke event that created dangerous air quality conditions for large swaths of the East Coast, not only was climate **mentioned just 15 times**, (and rarely mentioned was the) **prohibitive cost of mitigation** for socially **marginalized communities**. Heat waves and wildfires are alarming. The **flames, evacuations, burned structures, and apocalyptic skylines make headlines**. **Meanwhile, the less visible but equally deadly health effects of the smoke, and the systemic disparities they underscore, are lost in the haze**. News outlets (should) **do more than report the obvious**. (We need) climate action. The opinion writer is a Tacoma, Washington resident and a senior researcher on the Climate and Energy Program at Media Matters for America.

United Kingdom

RAWSEP View: This Telegraph article covers many topics in air pollution and in the aggregate, downplays indoor residential wood burning in the United Kingdom, although indoor residential wood burning in the United Kingdom is the leading source of PM2.5 pollution in United Kingdom, followed by traffic. This article also does not mention the 7/22/2023 withdrawal of approval of Ecodesign wood stoves by the Mayor London Sadiq Khan. That withdrawal of approval was significant because it acknowledged what had been known for years, that indoor residential wood burning has higher CO2 and PM2.5 emissions than the fossil fuel coal burning and wood burning has 450 times more emissions than the fossil fuel natural gas burning. From this long article, the sections on indoor residential wood burning, or statistics relevant to indoor residential wood burning are included, as well as the heartbreaking story of the death of Ella Adoo-Kissi-Debrah at age 10 in 2013, from air pollution.

Ella Adoo-Kissi-Debrah died at age 10 on 2/15/2013 died as a result exposure to air pollution from London traffic, but her mother Deborah has spoken out for the regulation of wood burning stoves in the United Kingdom, since both sources of pollution emit PM2.5 at dangerous levels. At this time, there is a two pronged attempt to control PM2.5 air pollution in London, regulation and shutdown of polluting indoor residential wood burning and creation of a ULEZ zone, where automobile traffic in some London areas is regulated.

Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates.

[Ella Adoo-Kissi-Debrah](#) grew up 30 yards from the railway bridge, in the home her mother Rosamund had lived in for more than a decade. In 2010, just before Ella turned seven, Rosamund took her to the GP to assess 'a peculiar cough'. Within two months she was in intensive care, one of about 30 hospital admissions that would follow over the next two years. The eventual diagnosis was hypersecretory asthma – a rare and dangerous variant that periodically floods the lungs with mucus. This condition almost always affects children, who usually grow out of it. But Ella never had the chance. On 15 February 2013, three weeks after her ninth birthday, Ella suffered a severe asthma attack and passed away. An inquest the following year ascribed her death to acute respiratory failure. Ella Adoo-Kissi-Debrah's schoolbag still hangs in the family sitting room, where she left it 10 years ago. 'Ella used to worry people might forget her and move on,' her mother has said. Rosamund has channeled her grief into building a legacy that should ensure they won't. Rosamund, mother of Ella Adoo-Kissi-Debrah, with Chris Whitty and Sadiq Khan.

Last year, the Clean Air (Human Rights) Bill, also known as Ella's Law, passed in the House of Lords – the culmination of a long crusade that in 2022 earned Rosamund a CBE for services to public health. Yet to pass in the Commons, it would require public bodies to review pollution limits and establish a commission to scrutinise Government action, with the intent of bringing air quality in every UK community up to minimum WHO standards within five years. It would also enshrine the right to breathe clean air. To some extent, the Clean Air (Human Rights) Bill is symbolic, proposing certain limits that one air-pollution specialist tells me would be unachievable 'anywhere on Earth, even Antarctica'. But as an inspiration, the purest expression of a young child's idealism, this dream of a flawless, fresh-air future seems entirely appropriate. Ella Adoo-Kissi-Debrah. Ella's grieving mother only considered the influence of airborne pollution later, when a neighbour shared their research into local air-quality measurements. 'In the evening when she had her last asthma attack,' Rosamund Adoo-Kissi-Debrah told a reporter from Energy Live News, 'Lewisham had one of the worst air pollution episodes ever.' This revelation would catalyze a tireless campaign, which in December 2020 finally won her a second inquest into her daughter's death. Professor Sir Stephen Holgate, an authority on air quality, told the Southwark court that Ella was 'a canary in the coal mine' on account of her exceptionally sensitive airways. 'When I had the opportunity to look at her lungs on the microscope,' he later said, 'I saw that the lining was largely stripped off [prolonged asthma can erode this lining] and therefore the chemicals in the air would interact with the nerves and the tissues directly.' Coroner Philip Barlow delivered an historic verdict. 'Air pollution was a significant contributory factor to both the induction and exacerbation of [Ella's] asthma,' he concluded. 'During the course of her illness between 2010 and 2013 she was exposed to levels of nitrogen dioxide and particulate matter in excess of World Health Organization guidelines. The principal source of her exposure was traffic emissions.' It was the first time a UK court – in fact, it's thought, any court in the world – had listed air pollution as a cause of death. The expert consensus suggests it is unlikely to be the last. The UK's Committee on the Medical Effects of Air Pollutants (COMEAP) estimates that 29,000 to 43,000 Britons over 30 die every year as a consequence of air pollution, part of a global annual toll of premature deaths that the World Health Organization (WHO) puts at a staggering seven million. Long-term exposure to airborne pollutants has been reliably linked to an elevated incidence of cancer, asthma, strokes, heart disease and diabetes. Air pollution in Northampton is equivalent to indirectly smoking 189 cigarettes a year.

United Kingdom

[How air pollution became one the UK's deadliest problems - EHN](#)

Environmental Health News

From Ulez to wood burners, every breath has become a battleground... but what can be done about it, asks Tim Moore in The Telegraph.

[How air pollution became one the UK's deadliest problems - The Telegraph](#)

The Telegraph

From Ulez to wood burners, every breath has become a battleground... but what can be done about it? Air pollution in Northampton is equivalent to indirectly smoking 189 cigarettes

The principal culprit may come as a surprise. 'Wood-fired stoves have become the single biggest source of small particle air pollution in the UK,' writes Owens, 'fully three times worse than road traffic.'

From Ulez to wood burners, why every breath is a battleground

August 6, 2023.

Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates.

Every new study and report seems to elevate the malignant potency of PM2.5: a correlation with infertility, another with low birth weight. Tim Dexter, clean air lead at the charity Asthma + Lung UK, says, 'PM2.5 is the air pollutant most harmful to human health'. 'Altogether, it's the fifth biggest cause of death in the world,' writes Jay Owens in her new book, [Dust: The Modern World in a Trillion Particles](#). 'If London's air was compliant with World Health Organization standards for PM2.5,' she notes, 'we'd all gain on average an extra 2.5 months of life. Some would gain much more.' One report estimated that in 2017, exposure to PM2.5 was linked to 3,799 fatalities in London – one in 16 of the capital's total death toll in people aged 25 and older. In Newham, one of the most polluted boroughs, the estimate for 2020 was one in 13 deaths. After a steep drop from 1990, linked to cleaner diesels and industrial combustion techniques, total UK PM2.5 emissions have remained stubbornly static since 2010. The principal culprit may come as a surprise. 'Wood-fired stoves have become the single biggest source of small particle air pollution in the UK,' writes Owens, 'fully three times worse than road traffic.' Noting that Defra has reported a 42 per cent increase in domestic wood burning since 2000, Asthma + Lung UK's Tim Dexter agrees that the practice is now 'the biggest contributor to PM2.5'. He points out that 46 per cent of those who burn wood at home are in the top social-class category, suggesting 'the primary reason to burn wood is not because of its economic or heating benefits, but predominantly for aesthetic reasons: to make the house seem more homely or because of the atmosphere created by a fire'. Lewis castigates wood-burning stoves 'for undoing a lot of good work that has been achieved in other areas, like cleaner vehicles'. Since 2022, new stoves must comply with much more stringent emission standards, but Lewis also wants to see a ban on open fires and the burning of wet wood, as well as suggesting a temporary total ban on using solid fuel during high-air-pollution days in winter. 'We need people to view the use of a solid-fuel fire in towns and cities as a special event,' he says, 'not a regular day to day source of heat.' Everyone loves a blazing hearth, but in terms of helping to rid our air of its most damaging pollutant, for the experts this is low-hanging fruit. 'At the time, the 1952 Great Smog was thought to have killed 4,000 Londoners; today, many argue the toll was three times higher. 'Recent large and well-conducted studies show that air pollution adds to health risks even at low concentrations.' 'particulate matter' referenced by the coroner as another major contributor to Ella's death is a very different adversary – stealthier, tough to pin down, insidious. 'With fine particulates, you don't get the severe reductions in visibility that people sometimes associate with pollution,' says Lewis. 'And there isn't really any smell either.' Particulate matter is everything in the air that isn't gas, a micro cocktail mixed up from things like smoke. In the urban environment, dominant constituents include 'black carbon', from man-made combustion. PM2.5 encompasses particles under 2.5 microns – about three per cent of the diameter of a human hair. At this size they can penetrate your lungs and bloodstream, playing a significant role in a roster of respiratory and cardiovascular illness, cancer and neurodegenerative disease. The capital and its environs are the fiercest battleground in the fight for clean air, and for reasons that for once have nothing to do with regional favoritism. As Lewis explains, it's simply down to demographics, geography, and climate. pollution from the continent blows over the Channel. On a Defra map showing background PM2.5 levels across the UK, The south-eastern quarter of England is a blot of yellow and red, depicting medium and high concentrations. The rest of the country is a soothing, lower-level blue. But that map is based on current UK PM2.5 limits. The legal maximum annual average here is 20 millionths of a gram, or micrograms, per cubic metre of air, with a 'target figure' of 10 by 2040. The WHO guideline limit for annual average exposure to PM2.5 is five micrograms per cubic metre of air – reduced from 10 in 2021. The newer number is exceeded by no less than 97 per cent of all the neighborhoods in England and Wales – and doubled in a third of local

authorities. In a report, before the change, the coroner at Ella's inquest declared that 'the evidence at the inquest was that there is no safe level for particulate matter and that the WHO guidelines should be seen as minimum requirements'. Hitting this level by 2040, as per the target, would exert a profoundly positive effect on the UK's physical and economic health: a Government cost/benefit analysis expressed in terms of 'net present social value' estimates a 500 per cent return on the necessary air-cleaning costs. Look beyond just getting traffic away from people, to getting combustion away from people. 'That sometimes might mean traffic, but it also might mean taking out a commercial gas boiler and putting in a heat pump.'

RAWSEP View: The one mile rule in Texas is one strategy of regulators to limit the number of complaints that can be made about air pollution.

Texas, One Mile Rule for Big Polluters is viewed as arbitrary by critics.

https://insideclimatenews.org/news/30072023/texas-commission-environmental-quality-one-mile-rule/?utm_source=

The One-Mile Rule: Texas' Unwritten and Arbitrary Policy Protects Big Polluters from Citizen Complaints

The policy has been denounced in lawsuits and petitions, but the Texas Commission on Environmental Quality denies that it exists.

July 30, 2023

Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates.

On the Gulf Coast in Texas, environmental groups called foul in 2020 when groups produced an analysis alleging that the company, Max Midstream, underrepresented expected emissions in order to avoid a more rigorous permitting process and stricter pollution control requirements.

In its response, Max Midstream cited what it characterized as the "quintessential [one-mile test](#)" by Texas' environmental regulator, the Texas Commission on Environmental Quality, to claim that the groups and citizens involved had no right to bring forth a challenge because they lived more than one mile from the Seahawk Oil Terminal.

The TCEQ agreed, rejecting all hearing requests and issuing the permit as initially proposed.

But the agency says the one-mile test cited by the company's lawyers doesn't exist.

Indeed, the test is not codified in Texas law or TCEQ rules. Yet it appears consistently in TCEQ opinions going back at least 13 years as a means to restrict public challenges to air pollution permits.

Dozens of Texas environmental groups have argued in petitions, now before the U.S. Environmental Protection Agency, that TCEQ unlawfully restricts access to judicial review, including through the one-mile rule.

Litigants in the Max Midstream case have now challenged the use of the one-mile rule in federal court and are awaiting a hearing set for this fall.

Colorado, Pagosa Springs

[Dry Lake Fire news update: 1,372 acres, 11 percent contained | The Pagosa Springs SUN](#)

The Pagosa Springs SUN

The Dry Lake Fire is burning at the northeast edge of a Potential (wildfire) ...

<https://www.colorado.gov/pacific/cdphe/wood-smoke-and-health>

Emails of 10 Assistant Attorney Generals preparing to sue the EPA to provide clarity for indoor residential wood stove manufacturers, vendors, and users. Instead, the assistant attorneys general should ask for a complaint based system in place of the failed wood stove certification program.

The states involved are Alaska, Illinois, Maryland, Massachusetts, Minnesota, New Jersey, New York, Oregon, Vermont, and Washington, as well as the Puget Sound Clean Air Agency. Contact emails for the 10 Assistant or Deputy Attorney Generals and a General Counsel are:

cody.doig@alaska.gov Alaska Senior Assistant Attorney General email (Cody Doig)

Jason.james@ilag.gov Illinois Assistant Attorney General email (Jason James)

Sgoldstein@oag.state.md.us Maryland Special Assistant Attorney General email (Steven Goldstein)

Turner.Smith@mass.gov Massachusetts Assistant Attorney General email (Turner Smith)

Peter.Surdo@ag.state.mn.us Minnesota Special Assistant Attorney General email (Peter Surdo)

Lisa.Morelli@law.njoag.gov New Jersey Deputy Attorney General email (Lisa Morelli)

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Paul.Garrahan@doj.state.or.us Oregon Attorney-in-Charge email (Paul Garrahan, one of two OR attorneys)
Steve.Novick@doj.state.or.us Oregon Special Assistant Attorney General email (Steve Novick, one of two OR attorneys)
Nick.persampieri@vermont.gov Vermont Assistant Attorney General email (Nick Persampieri)
Caroline.cress@atg.wa.gov Washington Assistant Attorney General email (Caroline Cress)
Jenniferd@psc.state.wa.gov General Counsel, Puget Sound Clean Air Agency (Jennifer A. Dold)

A new icon has been added to the RAWSEPresidents Website, which is now the nearest right icon. The icon is an ask that has already been described in Episodes 56G B (description of the parties who should be at the table when deciding on “safe” wood stove emission limits and fenceline measurements, rather than wood stove certification) and (emails to contact 10 Deputy or Assistant Attorney Generals and one General Counsel) (those PDFs are included at the icon link). Residents Against Wood Smoke Emission Particulates, see <https://RAWSEPresidents.wordpress.com> and click on the nearest right icon for The Ask: Contact 10 Attorneys General <https://rawsepresidents.wordpress.com/1-please-contact-10-attorneys-general-about-august-2023-suit-versus-e-p-a-asking-for-certainty-for-wood-stove-users-rawsep-asks-for-complaint-based-system-based-on-pm2-5-monitor-data-exceeding-e-p/> To the right of that “Barbie Goes To The Dating Game” <https://rawsepresidents.wordpress.com/1-barbie-goes-to-the-dating-game/> To the right of that “Cookies that may contain Rocks are recalled” <https://rawsepresidents.wordpress.com/cookies-that-may-contain-rocks-are-recalled/> to the right of that “The Fox Owns the Forest” card game <https://rawsepresidents.wordpress.com/the-fox-owns-the-forest-card-game-tba/> then to the right of that, the latest months, August & July 2023, of PDFs of articles with U R L’s to search on <https://rawsepresidents.wordpress.com/1-august-2023-pdfs-of-urls/> and <https://rawsepresidents.wordpress.com/1-july-2023-pdfs-of-urls/> To the right of that, Stickers to handout for RAWSEP, Games such as 1)Bingo for RAWSEP, 2)Crosswords for RAWSEP 3)EndWoodSmokeJeopardy 4)PM2.5FreeMonopoly & EndWoodSmokeMonopoly 5)“Vending Machines for PM2.5 monitors”, and icon links to 30 minute Youtube videos and Spotify podcasts as well as podcasts.google.com, Castbox and PocketCast. PocketCast is only Free on the phone App. Pocket Cast works on Apple phones) and, below those icons, icon links to monthly URL’s of PDFs from June 2023 to May 2022.

The 'One-Mile Rule' for Pollution Permit Hearings in Texas

The nonprofit Earthjustice obtained and analyzed data on all requests for judicial review of pollution permits made in Texas between January 2016 and April 2021. It found that 83% of granted requests came from within one mile away, and the remaining 17% were only slightly further away.

YEAR	APPLICANT	# OF REQUESTERS	RULING ON REQUEST		NOTES
			GRANTED	DENIED	
2021	Black Mountain Sand Eagle Ford, LLC, Comiso Springs, TX	5	5	0	All requests were within 2.5 miles of facility
2021	Equistar Chemicals, LP, Corpus Christi, TX	3	0	3	All requests were 2+ miles from facility
2021	Martin Marietta Materials Southwest, LLC, Center Point, TX	6	1	5	The granted request was within 1.5 miles of facility; those denied were 2+ miles from facility
2021	Holcum (US), Inc., Midlothian, TX	34	0	34	All requests were 2+ miles of facility
2020	Citgo Refining and Chemical Company, LP, Corpus Christi, TX	1	1	0	The granted request was within 1 mile of facility
2020	Epic Piping, LLC, San Marcos, TX	3	0	3	All requests were 4+ miles from facility
2020	Lhoist North America of Texas, LLC, Burnet, TX	15	0	15	All requests were 3+ miles from facility
2019	Collier Materials, Inc., Llano County, TX	83	72	11	Nine granted requests were within 1 mile of facility; one was a PO box, one was 200+ miles away from facility; two denials were within 1 mile of facility and all others were 2+ miles from facility
2019	US Cement, LLC, Brady, TX	24	11	13	The granted requests were within 1 mile of facility; those denied were 2+ miles from facility
2019	Ingram Concrete, LLC, Somervell County, TX	24	6	17	The granted requests were within or just over 1 mile of facility; those denied were 2+ miles from facility (six were PO boxes); one was referred to Texas State Office of Administrative Hearings (SOAH)
2019	Texas LNG Brownsville, LLC, Brownsville, TX	6	1	5	The granted request was 1.6 miles from facility; those denied were 2+ miles from facility
2019	Adobe Walls Gin, LP, Gray County, TX	1	0	1	Request was 2 miles from facility
2018	K&K Construction, Inc., Montgomery County, TX	2	1	1	Both requests were within 1 mile of facility
2018	The Kansas City Southern Railway Company, Port Arthur, TX	1	0	1	Request was 3 miles from facility
2018	Vulcan Construction Materials, LLC, Bulverde, TX	205	12	193	All granted requests were within 1.5 miles of facility; five denied requests were within 1 mile of facility and all others were 2+ miles from facility
2018	Rio Grande LNG, LLC, Brownsville, TX	8	0	8	All requests were 2+ miles from facility
2017	J.R. Thompson, Inc., Cooke County, TX	2	0	2	One request was within 1 mile of facility; the other 2 miles from facility
2017	Cherry Crushed Concrete, Inc., Houston, TX	2	1	1	The granted request was within 1 mile of facility; denied request was 5+ miles from facility
2017	Saint-Gobain Ceramics & Plastics, Inc., Bryan, TX	16	1	15	The granted request was within 1 mile of facility; denied requests were 3+ miles from facility
2017	Jagoe-Public Company, Denton, TX	1	1	0	The granted request was within 1 mile of facility
2017	Lincoln Manufacturing, Inc., Magnolia, TX	5	1	4	The granted request was within 1 mile of facility; two denied requests were within 1 mile of facility and two others were 2+ miles from facility
2016	Georgia Pacific Gypsum, LLC, Quench, TX	1	0	1	Request was 5+ miles from facility
2016	Kloeckner Metals Corporation, Houston, TX	1	0	1	Request was 2 miles from facility

SOURCE: Data obtained by Earthjustice through a records request with the Texas Commission on Environmental Quality

PAUL HORN / Inside Climate News

“None of the requestors reside within one mile of the plant’s emission point.”

—TCEQ executive director Toby Baker

“It is not found in any statute, regulation or guidance document. Instead, it is founded in common sense and experience.”

—Lawyers for Indeck Wharton

“While not codified anywhere, this ‘rule of thumb’ is used regardless (of) how large the source is.”

—Petition filed with the EPA in 2022 by Texas environmental groups denouncing TCEQ air pollution management

“This empowers the TCEQ full discretion to deny any person the right of judicial review.”

—Petition filed with the EPA in 2021 by Texas environmental groups denouncing TCEQ water pollution management

“The Commission has never adopted a one-mile policy.”

—TCEQ spokesperson Laura Lopez





