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Questions on EPA's Standards for Residential Wood Heaters

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Wed, Feb 4, 2015 at 4:55 PM

To: "Ambrosio, Patrick" <PAmbrosio@bna.com>, "mhatech@yahoogroups.com" <mhatech@yahoogroups.com>

Hi Patrick:

In the first NSPS in 1988, masonry heaters were classed as "non-affected facilities". The preamble to the regulation states that this is because they were regarded as "likely" to be clean burning due to the fixed high burn rate. Masonry heaters combine a fast hot fire with high mass thermal storage. This spreads the output over 12 to 24 hours and avoids overheating the house. It eliminates the possibility of slowing the burn to the point of smoldering, which can increase emissions by a factor of 100X or even more. MHA (Masonry Heater Association) testing has reasonably established that current technology masonry heaters fuelled with cordwood are on a par with pellet stoves, in terms of particulate (PM2.5) emissions.

Unfortunately, when clean air authorities pass local woodburning regulations, they most often require "EPA certified stove only". As a result, MHA has been working for many years to obtain EPA recognition for masonry heaters.

EPA's draft proposal for masonry heaters in the new NSPS was based on existing woodstove regulations. It was impractical for masonry heaters, which are typically one-off site built appliances weighing 1 - 5 tons. It is not feasible to test them for emissions using the currently prescribed EPA Method 28 which requires putting the appliance on a weight scale in order to determine its burn rate.

MHA's NSPS submittal proposes alternate test methods. It also advocates for the European method of certifying proper masonry heater performance via a software design algorithm based on Euro-Standard EN-13384. EPA has recognized these efforts, and in the current NSPS has chosen to defer regulation until these methods are developed to the point that 3rd party certification meeting EPA requirements can be obtained. MHA currently estimates that it will require 3 - 5 years of additional development to achieve this goal.

Best

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On Wed, Feb 4, 2015 at 3:25 PM, Ambrosio, Patrick <PAmbrosio@bna.com> wrote:

Norbert,

Dick Smith at the Masonry Heater Association referred me to you with this. He said that he's at a conference and hasn't had an opportunity to review EPA's final rule today on new source performance standards for residential wood heaters, but said you'd likely be able to help.

I'm looking for some reaction to the EPA's decision to not move ahead with the proposed emissions standards for new residential masonry heaters. Specifically the agency said it will allow for additional time for the Masonry Heater Association to finish efforts to develop "revised test methods, an emissions calculation program and an alternative dimensioning standard."

I'm looking to provide my readers with some additional insight on these issues and how EPA's decision to not move

ahead with these standards will affect industry. My deadline will be around 6 p.m. eastern. Feel free to give me a call at your convenience.

Thanks,

Patrick

Patrick Ambrosio

Reporter at Bloomberg BNA's Daily Environment Report

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