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**Residential Wood Combustion Technology Review
Volume 2. Appendices**

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Abstract

A review of the current states-of-the-art of residential wood combustion (RWC) was conducted. The key environmental parameter of concern was the air emission of particles. The technological status of all major RWC categories was reviewed. These were cordwood stoves, fireplaces, masonry heaters, pellet stoves, and wood-fired central heating furnaces. Advances in technology achieved since the mid-1980's were the primary focus. These study objectives were accomplished by reviewing the published literature and by interviewing nationally recognized RWC experts.

The key findings of the review included: (1) The NSPS certification procedure only qualitatively predicts the level of emissions from wood heaters under actual use in homes, (2) Wood stove durability varies with model and a method to assess the durability problem is controversial, (3) Nationally the overwhelming majority of RWC air emissions are from non-certified devices (primarily from older non-certified woodstoves), (4) New technology appliances and fuels can reduce emissions significantly, (5) The ISO and EPA NSPS test procedures are quite dissimilar and data generated by the two procedures would not be comparable, and, (6) The effect of wood moisture and wood type on particulate emission appears to be real but to be less than an order of magnitude.

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List of Experts Interviewed

Mr. John Crouch
Director of Local Government Relations
Hearth Products Association
7840 Madison Avenue, Suite 185
Fair Oaks, CA 95628
interviewed January 20, 1998

Mr. Rick Curkeet, P.E.
Manager
Intertek Testing Services
8431 Murphy Drive
Middleton, WI 53562
interviewed January 14, 1998

Mr. Bob Ferguson
President
Ferguson, Andors and Company
P.O. Box 678
South Royalto, VT 05068
interviewed January 16, 1998

Dr. Skip Hayden
Director
Combustion and Carbonization Research
Laboratory
555 Booth Street
Ottawa Ontario K1A0G
CANADA
interviewed February 26, 1998

Mr. Daniel Henry
Vice President
Aladdin Steel Products, Inc.
401 N. Wynne Street
Colville, WA 99114
interviewed January 16, 1998

Dr. Dennis Jaasma
Associate Professor
Department of Mechanical Engineering
Virginia Polytechnic Institute and State

University
Blacksburg, VA 24061
interviewed February 20, 1998

Mr. Robert C. McCrillis, P.E.
Mechanical Engineer
Mail Drop 61
U.S. Environmental Protection Agency
National Risk Management Research
Laboratory
Air Pollution Prevention and Control
Division
86 T.W. Alexander Drive
Research Triangle Park, NC 27711
interviewed January 14, 1998

Mr. Ben Myren
President
Myren Consulting
512 Williams Lake Road
Colville, WA 99114
interviewed February 5, 1998

Mr. Michael Van Buren
Technical Director
Hearth Products Association
1601 North Kent Street, Suite 1001
Arlington, VA 22209
interviewed January 14, 1998

**Interview Briefing Package - RWC Technology Review
Environmental Protection Agency Order no. 7C-R285-NASX**

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- 1. State-of-the-art of wood stove combustion and emission control technologies.**
 - 1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*
 - 1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*
 - 1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*
 - 1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*
 - 1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*
 - 1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*
 - 1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*
 - 1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

- 1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*
- 1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*
- 1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

2. State-of-the-art of fireplace emission control technology.

- 2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*
- 2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*
- 2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*
- 2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*
- 2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

3. State-of-the-art of wood-fired central heating furnace emission control technology.

- 3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

4. State-of-the-art of pellet-fired wood stove technology.

- 4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*
- 4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*
- 4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

1. Ramifications of ISO.

- 5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

2. Correspondence between in-home and laboratory emission test results.

- 6.1 *How accurately do certification tests predict in-home performance?*
- 6.2 *How would you design research testing in the laboratory to simulate in-home use?*

3. EPA Method 28 strengths and weaknesses.

- 7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*
- 7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*
- 7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated*

air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?

- 7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

4. EPA Methods 5G and 5H correlations.

- 8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

5. Performance deterioration of EPA-certified wood stoves in the field.

- 9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*
- 9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

6. Stress test pros and cons.

- 10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

- 10.2 *Should a stress test be made part of the certification process?*

7. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

- 11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*
- 11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

8. Routine maintenance.

- 12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*
- 12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*
- 12.3 *What would the key elements of routine maintenance be?*

Table 1
Emission Factor Reduction Potential, in Mass/Unit Mass Dry Wood Burned,
for Various Alternatives to Conventional Stoves and Cordwood

Appliance	Particulate Emission Factor		
	lb/ton	g/kg	reduction %
Conventional	37	18.5	-
Non-Catalytic	12	6	68
Catalytic	13	6.2	65
Pellet	4	2	89
Masonry Heater	6	3	84
Conventional with densified fuel	25	14	24

Table 2
 Effective Pollutant Reduction Potential, in Mass/Thermal Unit Heat Delivered,
 of Various Alternatives to Conventional Stoves and Cordwood

Appliance	Efficiency %	Heat Content (BTU/lb)	Mass particulate emission/delivered heat		
			lb/MBTU	g/MJ	reduction %
Conventional	54	8,800	3.89	1.68	-
Non-Catalytic	68	8,800	1.14	0.49	71
Catalytic	72	8,800	1.02	0.44	74
Pellet	78	8,500	0.31	0.13	92
Masonry Heater	58	8,800	0.59	0.25	85
Conventional with densified fuel	57	8,800	2.79	1.20	27

Table 3
Emission Factor Reduction Potential, in Mass/Unit Mass Dry Wood Burned,
for Various Alternatives to Conventional Fireplaces and Cordwood

Appliance	Particulate Emission Factor		
	lb/ton	g/kg	reduction %
Fireplace	25	12.5	-
Fireplace with wax logs	21	10.5	16(70%) ^a
Non-Catalytic Insert	12	6	65
Catalytic Insert	13	6.5	89
Pellet Insert	4	2	84

^a Wax logs on a mass particles per time basis show a 70% reduction which may be relevant due to the aesthetic use of fireplaces.

Table 4
Emission Factor Reduction Potential, in Mass/Thermal Unit Heat Delivered,
of Various Alternatives to Conventional Fireplaces and Cordwood

Appliance	Efficiency %	Heat Content (BTU/lb)	Mass particulate emission/delivered heat		
			lb/MBTU	g/MJ	reduction %
Fireplace	7	8,800	19.86	8.55	-
Fireplace with wax logs	8	15,000	8.75	3.76	56
Non-Catalytic Insert	68	8,800	1.14	0.49	94
Catalytic Insert	72	8,500	1.02	0.44	95
Pellet Insert	78	8,500	0.31	0.13	98

Table 5
Comparison of ISO 13336 (Draft) with EPA Methods 28, 5G, and 5H

Test Method	Emission Sampling Technique	Fuel Spacing	Fuel Species	Efficiency	Reporting Units
ISO 13336	dilution tunnel	0.75 inches	many including coal	calorimeter room	gram/kilogram
EPA 28	N/A ^a	1.5 inches	Douglas fir	N/A	grams/hour weighted average
EPA 5G	dilution tunnel	N/A	N/A	N/A	N/A
EPA 5H	direct flue	N/A	N/A	N/A	N/A

^a N/A = Not Applicable

Table 6

Method 28 - Burn Rate Weighted Probabilities for Calculating Weighted Average Emission Rate Based on 43 Homes in Waterbury, VT, Glens Falls, NY, and Portland, OR.

Waterbury, VT	HDD ^a = 7953
Glens Falls, NY	HDD = 7547
Portland, OR	HDD = 4691

DOE/EIA - 0321 (93)
Wood cords burned from December 1992 through November 1993 by HDD

HDD	Millions of Cords
>7000	7.0
5500-7000	5.6
4000-5499	6.7
<4000	8.0
	27.4 total

^a HDD = Heating degree days

**John Crouch - Director of Local Government Relations,
Hearth Products Association**

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: In terms of conventional stoves, the emissions reductions are very different, and the conventional stove numbers and the emission reduction numbers are very different, depending on whether the household studied was an Eastern household or a Western household. I think the conventional stove emissions are higher in the West, because of lower degree days and the tendency of consumers in the West to acquire large firebox stoves and burn them on Western softwood. Now the emission reduction may be greater in the West, ironically, because of course we are tuning our stoves for douglas fir, which is still a softwood even though it is one of the denser softwoods.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: Probably, although we have to be careful here in that so much of the work in the AP-42 database still relates to our industry's earliest shots at certified stoves. And although certified stoves haven't changed a lot in the last four years, some of the stoves which figured prominently in the in-situ work for those databases are much older than that, and are now history.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I think the answer is probably yes, and then the question is, does it need to be? Are catalytics going to be used in the market place? Which, is a polite way to say, does anybody care? The market share for catalytic appliances has decreased markedly in recent years.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: I think it is, but I haven't been able to convince regulators that it is. There is tons

and tons of densified fuel sold in some cities. People in this industry or regulators who are not familiar with it probably think that densified Pres-to-Log® type fuel costs too much. Manufactured fuel is a credible emission reduction strategy. It's credible technically, but as a salable strategy, I don't know.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: No comment.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: No comment.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: Yes and no; they shouldn't be classified as a woodstove, but they should be subject to some type of certification. There needs to be a "Certified Masonry Heater" option for these appliances.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

No comment.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: I agree with that in theory, but I have been in front of a lot of city councils and county supervisors, and anything that would take away from the g/hr concept tends to make people suspicious. So it may be too late to change the way we do this.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: Yes, the industry has had enough time now to get used to this idea, and if there were a period of two or three years where manufacturers could test their stove and be ready before their results were listed, it is appropriate.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Absolutely. Certainly the difference between phase I and phase II was for some stoves very significant. There were some stoves that were certified in phase I and the manufacturers gave up when it came time to certify to phase II, because the changes were so dramatic. They just packed it in. There were important changes in phase II that, probably, make the stoves more consistent performers in the field, and that's what everyone is interested in. Could stoves be changed even more? Yes, I think that was the sum total of that Friday's discussion, and I hope that would be the consensus here. They could be changed more, if we had an emissions test that was more accurate in terms of mimicking the real world. Until and unless the emissions test is reconceptualized, certified stoves will remain stuck where they are. This is probably appropriate, given the extremely low volume of sales.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: Well they are consistent with what I've seen in other published OMNI reports.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: No comment.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: No comment.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: I believe that heat exchange channels, however you define channels, are fundamental to that distinction.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: I strongly disagree. Fireplaces are not heat producing. Generally, fireplaces are an aesthetic device from which consumers do not expect heat, just the feeling and the perception of warmth, but they don't really expect real heat out of a fireplace. This concept is appropriate in wood heaters, pellet stoves, or masonry heaters, but by definition it is not appropriate in aesthetic fireplaces.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: The EPA New Source Performance Standards killed the indoor furnace industry and created this little loop-hole which the outdoor furnace industry is beginning to exploit and kind of underscores the need for a more comprehensive wood burning regulation which sets out over a several year period to codify all forms of wood burning technology.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: These are all that we've got, but we must remember that the 'n' value, the number

of data points used here, is very small and highly dependent on a handful of households and the stove and the size of the house and whether consumers had made the right choice or not. To my knowledge, most of the pellet stove models that were used in those studies are no longer available for sale. Here is one area where there needs to be some revisiting.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: I wouldn't use the term "close the loop-hole". I would say, "is the proper place to cut off the definition of a wood heater?" We all know the whole discussion during the Reg-Neg ignored this emerging category of pellet stoves. So this gets back into my other broader comment, which is, instead of going back in and changing the NSPS in a piecemeal fashion, there needs to be a true revision of the whole thing that deals with the category of pellets and masonry heaters and outdoor furnaces. To go back and mess with it piecemeal, just will create more potential loop-holes and mistakes.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: Sure, more fully automated operations and much better handling of ash.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I don't think we know enough. We really need to see the ISO methodology run on some current EPA certified stoves and see what we get. We just don't know enough yet really to advocate that. But I do feel strongly that if the EPA were to reopen the wood heater process and review that and then choose not to adopt the ISO, that would be the end of the ISO method. So we need to do that before the EPA, if they ever do, reopen the NSPS. So it needs to be done earlier, rather than

later.

6. Correspondence between in-home and laboratory emission test results.

6.1 How accurately do certification tests predict in-home performance?

Response: I believe certification tests are fairly accurate for that handful of families who burn douglas fir 2 by 4's with an inch and a half of air space around each piece of fuel. For the rest of the country, I suspect it can be improved on.

6.2 How would you design research testing in the laboratory to simulate in-home use?

Response: We have got to use different piece sizes and different surface to volume ratios and we have got to reduce the amount of air space between the pieces. And we probably should test the stoves with wider moisture types; the stoves have to be certified not just with a focus on burn rates but with a focus on different moisture levels. Because of course, everyone's woodpile has a little different moisture level in it. And that varies more than density. As a trade-off to all these changes, I think we could simplify the tests as well, just analyze for gas ratios, for instance, or just run a high and low run. The tests as they are currently constituted are far too expensive to run.

7. EPA Method 28 strengths and weaknesses.

7.1 Method 28 is in part an "art". Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?

Response: See HPA's input (Appendix C, page C-9).

7.2 Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?

Response: See HPA's input (Appendix C, page C-9).

7.3 The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error.

The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?

Response: See HPA’s input (Appendix C, page C-9).

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: See HPA’s input (Appendix C, page C-10).

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: The overall suggestion of question 8 reflects the possibility of trying to ‘tweak’ the existing NSPS, dealing with the correlation, and flow rates. I would advocate that what the EPA needs to do is fundamentally start over, which means allow itself several years. Start with test methodology and then move into wood heaters and then masonry heaters and pellet stoves and, if necessary, have different test methodologies for different appliances and not try to fix the weaknesses of the current methodology. Obviously, after such a revision was completed, the industry would need a reasonable period to phase in new models, and all existing models would need to be grandfathered to the end of their certificate date.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: Well I think that it’s clear that people are not replacing their catalyst as soon as they should, from what I’ve been told by the company who sells replacement catalysts--so that’s a concern. The work that the late Skip Burnett did on durability also underscored the weakness of some stove designs in terms of their bypass designs. I’ve not seen data that would confirm that a stove designed for a catalyst can produce as much emissions as a conventional stove. My suspicion is

that the opposite is true, that even a poorly functioning catalyst is still an improvement over a conventional stove.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: It would be more important to have a certified installer who was certified to install that stove, adjust the draft, because the stove is naked or unprotected against overdraft. That's as true for non-catalysts as it is for catalysts, but it is much more destructive. What Glens Falls taught us was that it's almost instantly destructive of catalytic stoves as compared to non-catalytic.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: I have fundamental questions whether that was the best approach. A better approach, it seems to me, is to redo the entire NSPS and require woodstoves, if they are going to be tested for a particular draft, to allow themselves to be run only at that draft or within a draft range. Yes, if they are going to be sold without any overdraft protection, then they would need a stress test to prove that they could do that. But the stress test should be removed if they are allowed, encouraged, or required to have overdraft protection. And I think with catalytic stoves that is fundamental, but it's probably also useful in terms of all the others, all the non-catalysts.

10.2 *Should a stress test be made part of the certification process?*

Response: It's asking the wrong question. "Should overdraft protection be made part of the stove design?" is the better question. And the answer is yes.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: I think this is a critical area and one that is not adequately addressed at all in the certification test. And as I have said earlier in the woodstove portion, I just think we made a big mistake by field testing the stoves in cold parts of the country where people used hardwood and having them certified in a part of the country where people were using softwood--all of this to apply to air sheds that were in the softwood territory. We either just have to have different tests or the test has to be broadened to have us burn both types of wood, with very different types of moisture categories. Once again, this could only be addressed in the context of redoing the whole NSPS. You couldn't just kind of do some touch up, by changing the fuel species. You need to rethink this from the start. Before you do that, you have to ask if the effort involved will really have any impact on the environment. With so few woodstoves being sold, would a complete rethinking of the NSPS really be warranted?

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: I think that 11.2 is more critical than 11.1, that density is most critical. Other than OMNI's own fuel study, no I am not aware of any other data. Could emissions be different for different tree species? It could and probably is different.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves?*

Would this be relevant for pellet stoves with electronic and moving parts?

Response: Probably yes. If a pellet stove gets so gummed up it's going to shut down, maintenance is really important for pellet stoves, it affects emissions because it shuts them off.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Yes it'd be good theoretically. Automobile owners aren't trained in the emissions of their car when they purchase it, but it does have a "check engine light". I suppose that's a good idea, but not many people are buying catalytic stoves anymore, anyway.

12.3 *What would the key elements of routine maintenance be?*

Response: Depends on the stove.

Rick Curkeet, P.E. - Manager, Intertek Testing Services

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: Yes, they are reasonable. However, the baseline for “conventional stoves” does not reflect the broad range of emissions rates for this type of stove. It is much greater than the range indicated in the table.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: The efficiencies for non-catalytic and pellet stoves are reasonable as averages for the group. There are, of course, specific models which are significantly better and perhaps some that are significantly worse than the table indicates. Catalytic stoves, I would say do somewhat better than the table values on average, but again there is a substantial range between models. I think the conventional stove efficiency estimates are optimistic. Many of the ones we tested in the early days were below 50%.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I would say yes, and that also goes for non-catalytic technology. The greatest gains might come from electronic control of combustion air to adjust for fuel and temperature variations and optimize the combustion conditions.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: My first reaction is they could provide consistency in what goes into the unit to get better consistency of performance. My second reaction is that, as a large scale emissions reduction strategy, it is not in the big picture. I don't think we can tell consumers who bought wood stoves because of their ready access to free or low cost cordwood, that they now must purchase manufactured fuel. Burning cordwood is an environmentally friendly use of a readily available renewable energy source and should not be discouraged. Clean burning in well designed appliances is the best answer.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: In my experience this is more a “trick of the trade” in obtaining good EPA emissions test results than it is a reliable method of ensuring good field performance. In our experience, this method becomes important when you must get a good test result at a low burn rate. Our clients are often very particular about pre-burn conditions for the low burn tests that will assure the maximum allowable heating of the refractory materials. This improves the chances for a quick secondary combustion light-off and low emissions measurements. I doubt that the average consumer routinely reproduces this in the field.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: Yes. We have seen designs that have had a special “start-up” setting that helps get a fire started quickly. We’ve had trouble with these though because EPA has considered such settings as operating controls and required full load tests with the controls fully open. This can result in such high burn rates that it overpowers catalysts or creates artificially high gram per hour emissions rates. As for wax logs, used as kindling I’m not sure it would have a similar impact on all types of stoves. Some might benefit but others might not.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: Not if it means they would have to be tested by the current EPA method. The concern I have here is that masonry heaters are generally designed to burn wood loads at one high rate and store the bulk of the heat produced. The EPA method as currently written would force these units to produce a burn rate of less than 1 kilogram per hour. Thus the method is not compatible with the product and cannot produce a meaningful result.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: No comment.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: I agree 100%. While emissions per heat output ratings may be difficult to fit into the air quality model used by regulators, this format speaks to the purpose and environmental impact of the appliance. The current system does not reward the manufacturer for improving heating efficiency. But better efficiency means the user will need to burn less fuel and will therefore produce less pollution. It is possible to get lower gram per hour test results by simply extending the burn time for a particular setting. This does not result in a real emissions reduction since, if the user is not getting enough heat, he'll simply reload the stove more often, burn smaller pieces or make some other adjustment which bears little relation to the scenario used in the EPA test.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: I agree (see 10.9). As for an efficiency method, we should use one which is already published and in use – CSA Standard B415.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: There have been some marginal improvements and a few significant emissions reductions. Most improvements have been in making units more user friendly and tolerant of fuel and operating variations. I don't think there has been any substantial move toward better efficiency. Between design restrictions inherent in the EPA test method and weak consumer demand there has been very little R&D in this field for several years.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: I guess I'd have to say they are fairly reasonable. Of course we're always

concerned about how to determine efficiencies of open fireplaces. It's highly dependent on outdoor air temperature and how much excess air is used. At some outdoor air temperature the effective fireplace efficiency will typically be zero – the heat produced all goes to heat the outdoor air drawn in to replace combustion air. This temperature is usually estimated at about 20 to 30 degrees F.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: There are some available. It is really a question of price. If an emission control strategy increases the fireplace cost enough, few people will buy fireplaces. I don't think this is the best answer. Fireplace emissions can be readily reduced by good operating practices by the user and perhaps by some modest and inexpensive design improvements.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: No comment.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: A masonry heater is designed to capture and store a substantial portion of the energy produced in combustion. The heat is then transmitted slowly back to the living space. With a fireplace there is no attempt to store the heat produced and most usually is lost up the chimney.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: I agree to the extent that this approach penalizes manufacturers for design poor heating units. However, fireplaces are usually considered decorative products intended for occasional use. If the user only burns a few pounds of wood once or twice a week the environmental impact of poor combustion and low efficiency may not be significant.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: I don't know how many new units are being produced but I'm sure it's a very small number. Still, one really poor unit can be a significant problem if it's in your neighborhood. There have never been any standards for testing this type of product for emissions and efficiency. However, we have adapted existing methods and can say that the performance range is very wide. Poor designs may be 30% or less efficient and produce nearly 100 grams/hr emissions rates. Good designs are able to approach certified wood stove performance levels.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: Yes.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: Yes. The way to amend the regulation is to simply remove the 35:1 air/fuel ratio exemption. This has never been required by fireplaces (they meet the 5 kg/hr minimum burn rate exemption criterion anyway). Pellet units are readily able to meet emissions requirements and the exemption only encourages making these units less efficient to avoid the regulation.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: Yes, but not a whole lot in terms of emissions. There have been many

improvements in operating reliability, fuel handling, safety and other features. Emissions have not had much attention perhaps because they are low enough to begin with that there does not appear to be a lot to be gained.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I believe it has moved well through the ISO process, but there has been no input or endorsement from the US that I know of. In the long run it would be good to harmonize test methods globally.

6. Correspondence between in-home and laboratory emission test results.

6.1 *How accurately do certification tests predict in-home performance?*

Response: They are not at all accurate. The lab test results do show the trend that units which are better in the lab are also better in the home. However, the actual emissions numbers can be very far from what happens in the field. We know, for example, that a unit which may do very well with an 18% moisture Douglas Fir lumber test load, can do very badly with the same fuel configuration at 22% moisture. I doubt that many consumers would pay the attention needed to get a “fussy” stove to do what it does in the lab.

6.2 *How would you design research testing in the laboratory to simulate in-home use?*

Response: Some of the things which need to be looked at are: real cord wood (e.g., broad range of size, shape density, moisture). Things such as starting a fire, when it is reloaded (coal bed size), changing settings during a burn, all can make significant differences in emissions rates. I think it could be more beneficial to look at a broader range of fuels than it is to focus solely on burn rate setting as the current standard now does. I think we need to rely more on the homeowner’s ability to adjust the unit for local conditions. At this point it’s not considered.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Response: Yes, there is no question that all these factors can be adjusted and are adjusted. The manufacturers are extremely concerned about things like coal bed conditioning and moisture content. Currently we see a lot of designs where very minor changes make the difference between a good light-off on a low burn rate and a smoldering dirty low burn test. These things often make the difference between certification and no certification.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: The first thing I'd recommend is throw out the weighting method and just do a straight average. These units are used throughout the heating season, not just on average days. They will be run more on high fire in a large room in a big house than they will in a small room. They will be turned up when it gets really cold out and turned down when it warms up. They will be used throughout their available range depending on many factors including weather, building size, and insulation level. The EPA averaging method, by trying to represent all operating conditions, actually represents none (or few).

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?*

Response: First, this becomes a non-issue if the air/fuel ratio exemption is removed. Secondly, the math and chemistry are wrong and should be fixed. I have written EPA on this subject (F_0) and am awaiting a reply.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: This is the same basic issue as in 7.3. It is not correct to set a fixed hydrocarbon level and then attempt a chemical mass balance. This results in a mathematical paradox of an “over-determined system”. It is not necessary to measure hydrocarbons to resolve this issue. All that is needed is to carry out the mass balance calculation with an assumed hydrocarbon composition to account for the unburned hydrogen and carbon.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: It should not be reevaluated. 5H is a poor method and should not be applied to combustion processes which do not operate in steady state.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: 5H should just be eliminated. The 5G results should be used as measured and not “adjusted” by an unsupported factor.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: I recommend throwing out 5H, so this question is not relevant.

8.4 *The precision of EPA’s Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: I agree with the error band, but suspect it is even larger as it is applied to wood stoves in 5H. Maybe plus or minus 50%. I do not think that the error of the method should be added to or subtracted from a test result to determine if something passes. Rather the error should be considered in setting the pass/fail limit so that the desired goal is achieved. It is, of course, difficult to do this and be fair, with a method that has such a large error band.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: I think 5G works quite well as is. We might tweak it here and there, but I see no major improvements that would make a big difference. It is already a pretty accurate method. 5H is simply not appropriate for wood stove testing in my opinion.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: I think catalysts can and do last longer than 5 years when well treated. However, they should probably be replaced anyway. The problem is getting owners to do that, which I don't think can be forced. Yes, catalysts do stop functioning but so do seals on doors and bypasses of non-catalytic stoves. I've seen units that operate just as well with an inactive catalyst substrate as they do with a new active catalyst. Clearly an active catalyst makes the unit easier to operate cleanly and less sensitive to fuel and operating conditions. The real issue is maintenance and the real answer is all stoves will operate better and cleaner if properly maintained.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: First, I'd say improvements have definitely been made. I would say that in general the units still in production (and it's a pretty small list these days) are probably the best performers. That's why they're still here. I think it would be very difficult to set up any mechanism which would require people to perform a particular type of maintenance on their stove. It would be like trying to make a law that said you have to change your car's oil every 3000 miles. It would be more effective to try to educate people about the need for routine maintenance and perhaps emphasize the efficiency benefits. I can't see requiring people to pass a test or buy a license to own a wood stove.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: I don't believe this kind of stress test is needed. Manufacturers might want to use it just as a means of making sure they won't get a lot of complaints. However, as part of a certification process it poses a lot of questions. I would compare the proposed stress test concept to trying to determine the life expectancy of an automobile design by taking it to a test track and driving it at 150 miles per hour until something breaks. If the car lasts for only 10,000 miles under these conditions would you expect that that's how long it would last under normal driving conditions? There are a lot of things that can go wrong with a wood stove (other than overheating) which will affect its performance. Catalysts can be plugged, poisoned or coated with creosote. Gaskets can become worn or permanently compressed and leak. Welds can break and open even with normal temperatures. Durability testing is a complicated issue and should not be imposed without some real certainty that what is being done is really meaningful. It is very easy to create problems that don't come up in real life and miss the ones that do.

10.2 *Should a stress test be made part of the certification process?*

Response: No, a stress test should not be part of the certification process.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential*

wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?

Response

11.1-11.2: I would not recommend separate factors. It would be better to include the broad range of fuel characteristics in the test process and make sure the average emissions came out in the acceptable range. I think it would be more valuable to test with high density dry wood, low density wet wood, etc. and run four tests that way and average the results than it is to run four different burn rates with one fuel.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: Yes, it would apply to all three types of stoves to some degree. I think we assume that catalytic stoves need more maintenance than non-catalytic. I don't think that is necessarily true. I think we can see a lot of emissions and deterioration due to plugging up air inlets with ash, or maybe due to the deterioration of gasketing. As for pellet stoves, they seem to require a basic level of maintenance to keep them running which is probably sufficient.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: They should be offered. Training would be a very good idea, particularly if the dealer could provide it when the product is purchased. I'm not sure how you would make this happen – who would pay for it, etc. – but it would be nice.

12.3 *What would the key elements of routine maintenance be?*

Response: Keep it clean, replace worn or broken parts, make sure functioning parts function.

Bob Ferguson - President, Ferguson, Andors & Company

1. State-of-the-art wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: I don't think the numbers looked too unreasonable and are fairly consistent with the reductions we have always talked about in general. The reductions do appear to consider a partially degraded catalyst or leaking bypass for the catalytic stove and no degradation for the non-catalytic.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: This table shows the non-catalytic efficiency as being higher than the EPA default number, which I always felt was too low. I think that it is hard to get a woodstove efficiency much above the low 70% range and still have it work well in the field.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I have always felt that the substrate and catalyst suppliers could improve the technology. If the safe operating temperature range could be increased by a few hundred degrees, catalyst degradation would be dramatically reduced in the field. This would also allow designers to push the catalyst further in the application in the stove which is probably the only way you can ever get to a "zero emissions" stove. Manufacturers would be better off with a catalyst that cost 50% more, if performance and durability could be improved.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: We have had limited experience with wood-wax logs, but have not seen them as offering a big emission reduction potential. It depends on how the emissions are reported (g/hr, g/kg or g/MJ) and what the firing procedure is. We also have noticed an odor, which could be a nuisance if wood-wax logs were being burned regularly in many homes. I don't know if this is the case with all wood-wax logs.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: This has a big effect. How big? Like many important design parameters, the difference between passing and failing--it could be a factor of two or more. None of these stoves would work at low burn rates without the right combination of insulation and/or refractory materials.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: From my perspective it's a mass problem. You've got to get the stove hot and it takes a certain amount of heat input to warm up a 400 pound stove. I don't think you can get a big improvement by just looking at the initial kindling phase. I think that improvement can be made during refueling by the techniques employed.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: The 800 kg limit was arbitrary based on scale capacity and accuracy. It is my understanding that emissions from masonry heaters are quite low if operated in the manner intended by the designers. How many heaters are being installed nationwide? It doesn't seem worth the effort to develop methods and standards to regulate a small number of generally clean-burning heaters.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: I have no direct knowledge.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). Comments?*

Response: From a logical perspective, it is a better measurement for heating equipment but I don't think the issue of ranking between different types of wood burning appliances

is a particularly relevant issue. Within a single product category, such as woodstoves, I don't know how significant the changes in ranking will be in going from g/hr to g/MJ. I do know that adding an efficiency test method will add even more uncertainty to the results. Adding efficiency (delivered heat) to comparisons between product categories, woodstoves vs. fireplaces for example, could dramatically impact emission rankings regardless of whether it was compared to emission rate or factor.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: There is no commonly used or well proven efficiency method. There doesn't seem to be any market-driven incentive. Emissions and efficiencies don't sell woodstoves. Aesthetics, features and costs are the motivators. Until there is market pressure, you won't see efficiency measured or reported. From a regulatory perspective, there is no justification to require efficiency testing and I don't think it should be done. The increased costs offer no payback to the manufacturer, who already feels over regulated. The woodstove industry at present sales levels does not warrant any additional regulatory costs.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: I think it has improved. Non-catalytic emission technology has improved (at least in terms of emission performance) more than the catalytic technology. I think the warranty costs have caused all surviving manufacturers to produce more durable products, rather than concerns over long term emission performance. The market forces are at work on this issue.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: I don't have any first hand knowledge, only what I have read.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: Although there have been some attempts at developing products that retrofit into fireplaces while maintaining true fireplace features, I'm not sure that there is anything that is commercially viable (or even available) at the moment, other than fireplace inserts. There is some question as to whether fireplace inserts have made things better or worse, as they tend to change the use of the fireplace from occasional to more frequent or continuous use. This has both emission and safety implications. Any new technology for use in a fireplace has to have a low retail price point or it will not sell. Most fireplaces are used only occasionally and people will not be able to justify the cost of adding expensive technology for such limited use.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: I have to bet that it could be. Also, I think that the way the log is burned could have an impact on emissions. Right now, you just throw them on a conventional log grate. Some other type of holder could help.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: Obviously, there are not that many open doors, screens or loose fitting glass doors on masonry heaters. They have a much more controlled air flow path and, obviously, intentional heat storage, compared to the straight-up flow path of a traditional masonry fireplace.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: Most fireplaces are not used as heaters, so there is no need to rank them on a heat delivered basis. They are primarily used for aesthetic purposes and are used, at best, only occasionally. They can be used as an emergency heat source, but this is very rare. Fireplaces as heating sources started to phase out soon after Ben Franklin invented the first stove.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: I don't feel there are enough units being sold to merit any activity what-so-ever. There are only a handful of manufacturers. I don't think there has been anything published--so if testing has been conducted, it is probably a good assumption that the numbers aren't that good. They shouldn't be certified, as you would have to develop test methods and standards. The country would be better off using the money to pay manufacturers to phase out of production, sort of like the agricultural method of paying farmers not to grow certain crops.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: Exempt units are likely to be less efficient and represent the majority of existing pellet stoves.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: The 35:1 cutoff was intended for fireplaces. However, pellet stoves are the only product that even take advantage of the air-fuel exemptions. Fireplaces generally use the burn rate exemption. Pellet stoves probably don't need to be regulated at all. They are all quite clean burning. Let the marketplace decide if exempt stoves are acceptable. If pellet stove users demand products that use fewer pellets (more efficient), the manufacturers will respond.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: They have definitely improved. The driving force has been the cost of warranty. There are some pellet stoves that are considered to be very reliable. In fact, I'd

say that all the pellet stove manufacturers that are still alive out there produce a reliable product, or they would have been driven from the market.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: It is a good idea, but the question is how to get people to solve their specific differences?

6. Correspondence between in-home and laboratory emission test results.

6.1 *How accurately do certification tests predict in-home performance?*

Response: Not very accurately on average. There are a lot of stoves out there that have been designed to perform well during certification testing, without consideration for actual in-home performance. I think the performance in the home can vary widely, from good to bad for any given stove.

6.2 *How would you design research testing in the laboratory to simulate in-home use?*

Response: You would have to look at fuel variables (e.g., species, moisture, piece size, air spacing, logs versus cribs), fuel cycle variations (e.g., charcoal bed size and preparation, reload time, startup time, end-of-test). And then other factors, such as installation variables which could affect things like draft. It is a big job!!!

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Response: I think that they all have an effect and that the effect of each can be large. Within

the necessary allowable ranges for these parameters, people have turned their manipulation into an art. The influence can be the difference between passing and failing.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: Things have changed since the data were accumulated. Most people were using woodstoves as primary heating sources, and that is no longer the case. They are used less frequently and for backup heat. Coming up with a weighting scheme which is good nationwide is tough. Manufacturers all consider themselves as national companies and will always want one test series that will allow them to sell their products anywhere.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?*

Response: I'm not sure how important it really is. Most air-fuel ratio exempted products are pellet stoves, which are low emitters. I don't know how hard it would be to fix it, or if the accuracy and precision is any worse than the emission test method.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: To what advantage? I don't see the point in terms of exemption issues.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: This is a big issue for me. The correlation has always been questionable, in my opinion. There were very little data comparing methods in the area where it counts the most, at low emission rates. There were three correlation curves

presented and EPA chose the one which most severely penalized method 5G. You can't have a zero emission stove, if you use 5G. Use getting rid of 5H as justification for developing a good correlation of the methods at low emission rates.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: It proves that it is a correlation issue, if true. 5G is penalized at low emission rates.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: This is not new. There have always been problems with the algorithm. This is another reason to get rid of 5H.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: If 20% are within the limit, how many stoves have failed, or how many extra runs have been conducted that were 20% or less over? You will always have this issue, regardless of the precision. The passing grades were pushed lower in the beginning to account for precision, even though no one knew what the precision was. Obviously, the catching method is not the biggest problem here. The biggest variations occur in the Method 28 parameters. If Method 5 is 20%, what is the overall precision of woodstove emission testing?

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: 5H is inherently more complicated than 5G. EPA made 5G more complicated than it needs to be under the guise of QA, but for the most part it's quite workable as is. It is hard to make generalizations about improving the method. A line-by-line analysis is needed.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: I think there is a range of performance for catalytic stoves with removed or non-functioning catalyst. Some stoves have done other things besides just sticking a catalyst element in the ceiling and probably don't perform as badly as a conventional stove unless really turned down low. Non-catalytic stoves can also perform as badly as a conventional stove if operated improperly.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: Yes, I think they probably have. Certainly things like bypass dampers have improved. Stoves are generally being used less, which prolongs catalyst life. Training has always been a good idea, but is hard to accomplish, generically. It has to be stove specific to be effective. Building additional cost into the stove will further diminish sales (which are pitiful anyway). Fewer old stoves will be replaced, if costs for new ones go up more.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: I know you can break anything if you try hard enough, so at what point do you say it's okay? Is high temperature the only factor you should look at?

10.2 *Should a stress test be made part of the certification process?*

Response: Unless you can make an airtight case that a stress test is good predictor of long-term in-home durability, you can't justify its use. It would take years to properly determine this, rather than speculating at the expense of the manufacturers. The products already have to pass what amounts to a rare event stress test in order to get through safety testing. Market forces regarding warranty already push manufacturers toward producing durable products.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: I don't know of any recent data. Obviously no one is out there generating comparative data because they can't afford to. I feel that it could be different for different species.

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: There are some data, using a dilution tunnel, that looked at oak and fir and some with maple cordwood vs. fir cribs. These data were presented during Reg Neg but were sort of dismissed because they were generated by manufacturer(s).

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: I think that routine maintenance would help, as there is deterioration of important components such as door and bypass gaskets which can affect emissions. I feel

that all stoves need maintenance on a regular basis.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Probably not. People don't want to pay for it. Even if they do, some will not want to be bothered as time goes on. I'm not sure how you get people to do the right thing.

12.3 *What would the key elements of routine maintenance be?*

Response: Check and replace worn gaskets. Look for warpage or cracking and repair or replace parts. Inspect the venting system. Make sure all moving parts are functional. Clean or vacuum out air passageways. Inspect, clean or replace catalyst element(s).

Skip Hayden, Ph.D.-Senior Research Scientist
Advanced Combustion Technologies Laboratory

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: We don't see catalysts up here very much, let's put it that way.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: Yes, I think that was reasonable. There certainly is a wide variation on what we see, but 68 would be a better average. We haven't seen many, the catalyst might be slightly higher strictly because of this pressure drop, but the higher incomplete combustion products sometimes might cancel it out. So I wouldn't feel that the catalyst had significant advantages in terms of efficiency over the life of the appliance.

Statement: *OK, we had 72%.*

Response: Yes, I think that's an overestimate.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: Yes. If I took the better advanced combustion (non-catalyst) designs and worked in a catalyst after the combustion chamber of those designs as a tertiary clean-up, we could end up with some stoves with extremely clean operation. So basically instead of loading the catalyst and requiring it to go through a very wide range, you'd be requiring it to operate the way it does best in a car, even, where it's working with a relatively consistent fuel gas.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: Potentially yes.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: It's an intertwining effect with the air release. I don't think it's in itself the solution, so I have a hard time to define an answer to that question.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: Yes they would work. Basically what you're trying to do is to get a heated up chamber and some hot ash at the same time, without undergoing too much by-pass of the whole system.

Question: *I just threw that out there as an example. Are there any other technologies?*

Response: Certainly a small auxiliary ignition system would also do the trick.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: Yes. We have specific requirements for masonry heaters in our R2000 requirements.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: The efficiency range is extremely dependent on a specific heater. We've seen a factor of over two for different heaters, and even for the same heater under different stages of development.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: Yes and no. One of the problems we've got with some appliance designs--and, if you want, higher mass appliances fall into this category--is having sort of an

uncontrolled heat release. If the appliance is used where it would normally be expected to be used, let's say between 7:00 PM and 9:00 PM, or something like that, and then it's releasing heat into the house over a time when we've been counseling people to significantly reduce their thermostats and, hence, the heat input into the house, it's not necessarily an optimal usage of that heat. So, while the efficiency generation of the appliance is good, it is not as effective a use of that energy as it would be if you were to put that heat into an insulated masonry and you had a means to extract the heat from that insulated masonry at some much later time when it was required. It's sort of the opposite to if you're using the space-heating ability of a woodstove, as opposed to a central furnace; you're able to in effect lower sometimes the overall heat demand of the house--because you're heating the primary space to be heated and letting the other parts go a little bit. Sometimes when we see seasonal efficiencies of woodstoves, and this is where I go back into those numbers that you were quoting, we can see significantly higher efficiencies than that, effective efficiencies, if the location of that appliance is in good concert with the design of the house and the usage patterns within the house.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: I think that using default values is wrong; you should have an efficiency test or at least a valid means of calculating efficiency from the emissions test.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Marginally with some, more with others, since EPA 1990 certification, primarily in terms of the resilience of the product (especially baffles) and in the more intelligent multi-location usage of preheated air release. But due to the changing industry, the continued move to improve that product has in general not been what it could be. In recent years, most of the emphasis, intelligence and efforts have gone into gas fireplaces, rather than further advancing, what were potentially really excellent woodstove designs.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts*

shown in Tables 3 and 4 reasonable?

Question: *Fireplaces with wax logs 10.5 grams per kg?*

Response: We've seen lower than that, but also the firing rate with wax logs, just by the way they are run, is significantly lower, as well, giving further absolute emission reductions. Grams per hour reductions of a factor of four or five are possible. And that is with a non-efficient fireplace. That really is the important number for emissions, although it does nothing for efficiency.

Question: *OK, some other numbers from that table, I have a non-catalytic insert at six grams per kg, catalytic insert at 6.5, and a pellet insert at two?*

Response: Well, pellet inserts can be all over the map. We've got one now that's around 0.3, while some exempt units can be over 12.

Question: *OK, we had efficiencies on one of those tables. We had a typical open radiant fireplace as being 7% efficient.*

Response: We'd say plus or minus. It depends on the climate and the amount of what you're taking as the sort of the mean outside air temperature being heated up before it goes out. We think +/-5% to 7%, it's a little colder in Canada, so that you can actually have a fireplace, with its very large air demands, operating at a negative overall efficiency on the colder winter days.

Question: *Let's talk a little about the efficiencies of fireplace inserts, they are basically woodstoves, just a little less efficient.*

Response: The efficiency can be lower by as much as half, because a lot of the inserts go into fireplaces on outside walls, particularly ones that go in masonry fireplaces, and have no insulation on their outer casing (i.e. of the insert). On field trials, where we'd test an insert in the lab and its performance was effectively the same as a woodstove, above 50%, give or take a couple of percent, in some field installations we saw the real efficiency drop to the 30% range in the house, because you weren't able to extract that heat from the unit into the heated house space. Instead it was being conducted to the outdoors through the masonry. Hence, one of the prime recommendations that we have in Canada for inserts is that they should have an insulated outer casing.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technology are available? What retrofit options are there?*

Response: Basically, I would say that the same options you have for wood stoves, in effect, are available to you for fireplaces. We have a real hard time in Canada having such an appliance (i.e., a conventional wood burning fireplace) in a new house, which is significantly inefficient, being an appliance that runs at a high burn rate at high excess air, while polluting at the same time. Taking the same advanced combustion technology developed for woodstoves and using it in a fireplace design can be most effective. So reducing excess air and improving the completeness of combustion can be combined to give you significant reduction in particulate emissions. At the same time, efficiency is high and burn rate is low. This presupposes a tight unit that operates with the door always shut, except on loading, a ceramic glass front to allow most of the radiation from the flame into the room, good heat exchange, insulated outer casing and even sealed combustion. There is a major potential future for efficient clean burning wood fireplaces operating at low excess air with an attractive flame, allowing a renewable energy resource with CO₂-neutral emissions to be used in the majority of North American homes, allowing this technology to be a contributing factor in mitigating global warming.

2.3 *The use of wax fire logs reduce emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: Yes, it would be significant. However, we still consider it to be only a decorative use of the fireplace with no significant energy input into the house, and consider that to be a wasteful use of a renewable energy resource.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: I would put a lower or upper limit on excess air and I would also define it as a unit that has no combustion air contact with the dwelling in which it's installed. The masonry heater also has a significant amount of heat exchange surface.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: The problem is on defining exactly what efficiency is and how it is truly measured. Probably around 90% of the fireplaces in North America are being installed on outside walls. Right away, require that you have some kind of estimate, not only of combustion heat loss, but of casing loss and, potentially, of radiative, versus

convective, versus off-cycle loss, as well as a charge for heated house air drawn through the appliance, especially when it is running.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: The number of central wood furnaces in Canada, certainly in comparison to the United States, would be higher. In our Eastern provinces, it's a relatively common add-on to existing oil furnaces. Generally, they are as dirty as can be.

Question: *Do you have any emission data on them?*

Response: There were a couple of papers produced at the wood conference that we had down in New Orleans in the early 80's. In addition to the emissions seen from normal wood burning, as per stoves, there are dramatic peaks in emissions every time the furnace cycles "on" or "off", as well as very high emissions during the "off" or "stewing" condition. Finally, the advances in wood combustion technology seen in the better stoves, have not found their way into the furnace designs, which generally use 1970's combustion technology.

Question: *Do you think they should be certified?*

Response: Certainly, if the use of these central furnaces/boilers grows at all, they should not be exempt, because they are potentially very dirty, as explained above. In Canada, there is a draft CSA B415.2 emissions standard for boilers and furnaces.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: We saw a variation from one to two to up to ten g/h (and even higher), and the efficiencies from the high 70's to the low 50's and below for units running on very high excess air. I think those numbers in the table are optimistic, particularly for the exempt units.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: Yes. In Canada, we recommend that people buy only EPA-approved pellet stoves. We have developed a high ash pellet stove that's operating around 85% and its emissions are about 0.3 g/hr or less.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: In particular, some units have learned how to handle high ash fusion and some units have learned how to run at more concentrated (i.e. lower) excess air levels. Some units have been improved to handle accumulations of ash without disrupting the combustion process. Feeding techniques have advanced, as well as knowledge of satisfactory venting procedures.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I am unfamiliar with the ISO procedure. I feel that, as far as emissions are concerned, the EPA standard in general is pretty good.

6. Correspondence between in-home and laboratory emission test results.

6.1 *How accurately do certification tests predict in-home performance?*

Response: It depends on the design of the unit. A design with simple, obvious air control often has performance which reflects the lab very well. Complex operating procedures often do not translate into realized performance.

6.2 *How would you design research testing in the laboratory to simulate in-home use?*

Response: Ron Braaten (on my staff) would be a better one to talk to than me, although I do believe that it can be done simply and intelligently.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Response: Ron is better equipped to answer that one.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: In Canada, house insulation/heating load levels are usually set to reflect differences in degree days, so that results from one zone are fairly easily transported to another.

7.3 *The equation for the calculation of the air-to-fuel ratio in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?*

Response: Believe it should be corrected.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: We have done so using some complex hydrocarbon analyzers (not just standard FID's or heated FID's). In the initial development of clean burning equipment, it is important. It may not be so on an on-going basis where inference techniques

can be utilized.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: Ask Ron. (See response to 7.1)

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: Yes, I think there should be just one.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Statement: See my response to 7.3.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: Ask Ron. However, if wood burning is going to increase as a technique to help mitigate the global warming problem and meet climate change targets, technology should be improved, and the standards moved downwards, perhaps to 2.5 and 4 g/hr for catalytic and non-catalytic technologies, respectively.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: Ask Ron. (See response to 7.1)

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts only last five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: That's certainly possible, plus it can spill more combustion gases into the house. My experience has been that the deterioration will occur in sooner than 5 years.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: We counsel Canadians to buy advanced combustion stoves, rather than catalyst stoves. You can't get that kind of performance over the long term, or even necessarily over the short term.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: Well I think it's reasonable; in fact we're one of the initiators of that concept and were participants in it. However, I conceived it more as a tool for manufacturers to develop a more durable product than as a requirement for certification. I think that in general there are better ways to require a certain amount of dollars being spent rather than having a fairly costly test done. I would be concerned that this would significantly increase the cost of the appliance.

10.2 *Should a stress test be made part of the certification process?*

Response: For advanced combustion stoves, no. For catalyst stoves, perhaps.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20%*

range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?

Response: We did some work on wood moisture a few years ago, but I can't remember what the results were. Our general recommendation is that people use cordwood that's been air dried for at least one year. We also don't see significant difference between soft and hard wood in a good design.

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: We did some work, but found that with a good combustion design there was not a significant difference.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: One of the features of the routine maintenance would be the tightness of the gasket around the door and that might or might not, depending on the design, give you more or less particulate emissions on a non-catalyst stove. It would help you to control the burning rate, but it might also make it easier to burn wetter wood. Certainly routine maintenance around the catalyst, if that maintenance is such that you're not actually potentially replacing the catalyst or to maybe open up or seal a by-pass that wasn't there just by virtue of deposits. Also, interior cleaning to ensure the air ports are not restricted by ash deposit is important.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase. Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Operational yes; the trouble with manuals is they are often a little too long and big and the essential items don't necessarily get followed or even perceived. So yes

you should have it, but you should also have a short form of the important things to do. If you have a catalyst, there should be some sort of periodic means of verification and replacement built in to the cost of the unit. I do not believe that an external (i.e. non-houseowner) maintenance program should be a requirement.

12.3 *What would the key elements of routine maintenance be?*

Response: Other than the verification of the state of the baffle and if it's easily visible, the glowing catalyst operation and the tightness of the door. I think the important things are the ongoing operational checks that a homeowner should do. Obviously the flue pipe and chimney need to be examined and cleaned as required. Air ports should not be blocked.

We recommend the use of sealed double walled flue pipe from the appliance to the chimney to ensure good draft, to reduce likelihood of condensation/deposition in the chimney, and to run the appliance slightly hotter to ensure clean combustion.

An important general comment that I have is that for an advanced combustion (non-catalyst) stove or fireplace, the more attractive and complex the flame, the cleaner the combustion, so there is a good guiding tendency for the user to maintain lower emissions performance (for a woodstove or a fireplace).

Daniel Henry, Vice President -- Aladdin Steel Products, Inc. (Mike Hoteling with Aladdin Steel Products also present during interviews)

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: I think Mike and I agree they are. The consumer can have a major impact on in-situ wood stove performance. I think in some studies they were better trained than in other studies.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: Were all those stoves using the same method to determine efficiencies? I think, I have a feeling in the back of my mind, or a gut feeling, that the catalytic stoves have a tremendous amount of forgiveness for both g/hr and efficiency as a result of the fact that it's only determined after the by-pass is closed. 72% for catalytic overall seems kind of high. And good clean non-catalytics are kind of low.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: My opinion is all technology can be improved. The data that I've seen and at all the seminars where data are presented, the catalyst was not necessarily the problem--the stove design was, warping by-passes, combustors located in temperature environments that exceeded their capability. So, my answer is, I think all technology can be improved, be it catalytic or non-catalytic. And I don't believe catalyst technology has reached its peak potential and I don't think non-catalytics have either.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2.*

Response: I think so, if they were not too costly. And it would probably be more feasible in an urban environment where people have access to buying their fuel. But in a rural environment where people are cutting their own wood, they are still going to cut kindling.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: It goes both ways. It really is a design criterion that will tend to show that one might be better than the other. We're talking, on a 5 gram stove, a difference of plus or minus a gram between the high and low densities.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: I agree with that, albeit one of the things that will come up later is that in the emission certification series we were limited to 5 minutes of having the appliance wide open.

In a Northern climate zone, where a homeowner uses a woodstove for a primary heat source, the stove seldom needs to be kindled from a cold start. They just keep the stove going and keep feeding it. It's the cold start kindling, when the mass of the stove is absorbing the majority of the fire's heat that causes increased emissions. And in warmer regions, or during Spring and Fall in colder regions, when the stove is used only at night, it will need to be started cold. It may well be that specially designed wax logs or other products or devices could help reduce emissions, provided they didn't cost too much.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: I feel all wood combustion systems should have to meet emissions standards. And, I don't care whether it's a different standard than what woodstoves are currently tested under. Everything should have to prove to be clean burning, if they are going to regulate wood combustion or wood heat, because the wood stove has technically gotten a black eye for many years when there are other wood-burning systems that were emitting emissions.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: I don't know.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: I agree.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: That's definitely true, if an accurate method for certifiable products can be developed.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Yes. There's been kind of a lull the last couple of years, because the sales have been low and there hasn't been much incentive. But, I think now that there have been a few disasters as far as weather, wood stove sales are picking up and holding their own. Current technology stoves are more stable and reliable in their performance for emission certification.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: They seem to be.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: In 1991 or 1992, I got a call from Majestic to build them a clean burning fireplace. They were moving forward as a manufacturer under the belief that new fireplaces would be regulated, not unlike wood stoves, in the near future.

I developed a single burn rate appliance on which we conducted EPA certification style testing and it came in at, I think, 3.6 grams per hour, and they did two or three runs to confirm it. All I really did was take a fireplace and design a secondary combustion system, with an insulated baffle and secondary tubes and developed the air flow to keep up with the burn rate. And, I think the burn rate, at that time, was in the three kilogram per hour range, which was what we determined, based on the limited amount of data that were available, was where the average fireplace burn rate was, with closed doors--fireplaces that had no doors were generally lower than that. I thought there was a tremendous opportunity to apply non-catalytic woodstove technology to fireplaces. But, the fireplace had limited volume production due to high retail costs.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: Don't know.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: A masonry fireplace is a firebox, damper, and essentially a vertical flue. A masonry heater on the other hand is generally a smaller firebox which transfers heat to the massive masonry. A masonry heater is located centrally in the room so little heat is lost to the outdoors.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: I agree with that.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: I think a lot of these are used in rural areas and considering the fuels that are out

there, I don't think they should be regulated. Maybe just a spot check of some sort. I think the only thing that would benefit would be the testing laboratories. If it emits particulate into an air shed where it can have an adverse effect on the industry (my ability to make a living), then yes.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: They seem to be. Yes.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: Well there are six or seven of us left that manufacture pellet stoves. There may be two or three companies that I haven't heard of, but the numbers they are doing at this point are pretty insignificant. There is no data that indicates that even a poorly operating stove is a dirty burning appliance. They are inherently clean, becoming more and more reliable, and don't fix them if they aren't broken.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: Yes, vastly. You go back to the late 80's and early 90's, there were probably sixty pellet stove manufacturers building something and putting a name on it. Field experience problems arrived on the issues of cash flow, poor performance and so on and so forth weeded them out.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced*

with or be made comparable to an international standard?

Response: I would vote for something that would be accepted internationally.

6. Correspondence between in-home and laboratory emission test results.

6.1 How accurately do certification tests predict in-home performance?

Response: For some reason we thought that in-home use should be represented in a laboratory number, and in some cases they have been and in some cases they have not been. I believe that a laboratory number, with dimensional lumber and the latitude that we have within the test method, could be an indicator of performance, not what the stove should be able to do with firewood that's got bark and dirt.

We certify our woodstove with 15 feet of pipe, whenever homeowners burn the woodstove it can have anywhere from four to forty feet of pipe on it. That's going to affect the way it burns. There is a real correlation between the height of the stack, static pressure, and the combustion air flowing through the firebox of the appliance that EPA and we in industry didn't think too much about during the development of the standard. But, if we have in the field today an appliance experiencing what we refer to as an "over draft"--you could have a unit that's capable of putting out significant amounts of BTUs into a room, stuck on a 30 foot stack and the guy says, "It burns the wood up in an hour and a half and I'm freezing to death;"--obviously, all the heat is going up the chimney. We've had to come up with solutions for those applications to try and bring the static pressure seen in the firebox back to within parameters that are closer to what was seen during the certification. That can range from a chimney damper to a ring around the top of the chimney that reduces the diameter to, in some cases, putting firebrick up on the baffle to restrict the outlet of the appliance.

6.2 How would you design research testing in the laboratory to simulate in-home use?

Question: *So, how would you design a test standard to accommodate all of that? (See paragraph two of response to question 6.1.)*

Response: I don't think we would do it that way. I think you require the manufacturer to give actual static pressure numbers. Build a firebox that has got a static pressure port, and when you run the stove wide-open, require wood pieces that are roughly two inches square and are stacked in there in a crib form (four or five across and four or five left to right and then four or five front to back). Have certification requirements for certified wood installers and they burn the appliance and verify

the static pressure is within the allowable parameters--and you'd solve the problem.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an "art". Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Question: *In your experience what things have the most effect on particulate emissions?*

Response: Every one of them. It would be difficult to say that any one or two of those has more effect than one or two of the others. If I was going to make a pick, I would say fuel moisture.

Question: *How much influence do you think that can have? Can you estimate in grams per hour?*

Response: From 40 down to 2. Well if you've got a piece of wood that goes "pop", it blows your low burn out and you've got a 40 gram run. If it doesn't go "pop" and it burns and burns and burns, you've got a 2 gram run. That's the difference. A lot of it depends on if the wood is stable or if it's unstable. You can check that during the pre-burn. You cut a piece of the end and throw it in during the pre-burn. If it goes bang, pop, boom during the pre-burn, you don't use it during your test.

Question: *Do you think that if there were more flexibility during the five minute start-up, that these things would have less influence?*

Response: Absolutely. We write in our owner's manuals: after a new load of firewood, put the draft controls in the wide-open position and run the stove in wide-open condition until you've got all the wood engulfed in flame--and we put a time in there 15, 20 minutes wide-open and then shut the stove down. Well that heats the appliance up and gets the secondary system up to temperature, where it will maintain stable secondary, and it also kindles the new load of wood so that you are getting a release of combustibles that will sustain the secondary combustion. Once you've got that locked in, it's self sustaining and it's going to burn clean until that load of wood is in the char and you lose your secondary. So if the test method could replicate more real world instruction manuals, which the EPA has to approve also, then I think we would have cleaner performing field appliances. It would also allow us to do more things as far as firebox size.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: There are many factors that are going to come into this, but if you can get a region that has 100 wood stoves per square mile and then other places that are going to have none and there're going to be places that are going to be in proximity to wood and it's almost mind boggling to try to figure that one out.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a "predictor" of the air-to-fuel ratio?*

Response: I have no objection to proving the accuracy of it.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: I don't think that it's necessary to actually measure hydrocarbon vapor to determine air-to-fuel ratio. It should be possible to determine ranges of values for various hard and soft wood species under typical combustion conditions to come up with a close enough approximation for practical purposes.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: I always thought that 5H was right and 5G was corrected to match 5H. Now it appears that 5G is possibly correct and 5H was in error. There was quite a bit of discussion concerning if 5G is correct and the error with 5G is the correction factor and bring it up or down to 5H. I would lobby that if 5G is the correct number, then the problem with 5G is the correction factor. One of the things we have a lot of data on here is the Condar in parallel with 5G. Method 5G and the Condar were very very close, until we hit it with the correction number, and then they got apart and it was always in the negative, not the positive. We got to the

point where I stopped using 5G and stayed with the Condar, because when I get certified with 5H it was more realistic data.

I don't have a problem getting rid of 5H and going with 5G. I would hate to voice my opinion or raise my hand to vote on it, if we would have to take a penalty in performance numbers. The industry is now getting used to seeing two to four gram non-catalytic stoves and one and a half to three and a half gram catalytic stoves. If we suddenly come back there with five gram stoves and it's because of a number that we pulled out of our hats to use as the new single test method, then that's going to have some serious ramifications on--Oh, our technology went backward instead of forward, and numbers like the State of Washington's four and a half grams for non-catalytics, there is a potentially serious downside there. So whatever we end up doing, I don't want to see that happen. If 5G is correct, there should be no correction factor, eliminate 5H and leave the standard at 7 ½.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: 5H produces lower numbers than 5G.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: I think they ought to correct that, it's not going to hurt us as an industry; it's just going to give us a real number.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Question: *OK, the precision of EPA's Method 5 is estimated as being about 20%.*

Response: I'll buy that.

Question: *Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. Any comments on that?*

Response: That 20% error factor was discussed during the Reg Neg process. When they

turned the number from 9 grams an hour Oregon to 7.5 grams an hour EPA, I always felt like that 20% was accounted for. And another thing, in the Federal Register, No. 38, page 5877, in the rules, they have a different test frequency for people who are within 30% of the standard--so I believe it's accounted for there.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: Covered that already.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: True, I believe a well cared for catalyst can last longer than 5 years.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: Yes, should be up to the manufacturer's discretion.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: See response to 10.2

10.2 *Should a stress test be made part of the certification process?*

Response: I'm not standing for anything that raises the cost of certifying a product before we can go to market. Anything that we use that's going to increase the cost of certification, so that I can go to market with it, it's going to drive up the retail price. You take the top five manufacturers nationwide and only one of them is selling more than 1,750 of any one model currently. But I think a stress test, durability test should be based on real world operations.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: I think you've got that data with fuel performance and documenting the moisture content of the firewood pile.

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: Oak and it burned very very clean.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: Definitely; just like a car, routine maintenance improves the lifetime of anything. Especially with pellet stoves, blowers, heat exchangers, that's common sense. It tends to be far more critical for catalytic technology. They either work or they

don't.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Video format works really well. No.

12.3 *What would the key elements of routine maintenance be?*

Response: Front door gasket.

Dennis Jaasma, Ph.D. - Associate Professor, Department of Mechanical Engineering, Virginia Polytechnic Institute and State University

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: The numbers are a bit too low on pretty much everything. Catalytic and non-catalytic reductions are both listed too high. Whenever we have tested the conventional stoves the numbers have been around 22 g/kg. The estimate that I'm giving is on the Crested Butte data, it was never less than about 20. For catalytics the average is about 21. I don't think things are that bad in general.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: I didn't have any problems with efficiencies; the numbers weren't that bad.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: Anything like that can get better.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: It's not the answer to emission control due to the cost of the logs. People aren't going to pay for these, unless they become cheap.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: I don't know.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there*

improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?

Response: Having the dry wood and proper operations goes a long way. For example, kindling the fire and stacking it the right way.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: This is a regulatory issue. EPA may or may not have the money to regulate masonry heaters.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: I can't say, unless I knew how these appliances were operated.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: No, if testing costs are relevant the g/hr approach is OK for now. For masonry heaters, a g/kg standard is a good choice in order to avoid unnecessarily complicated test procedures.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: It is really up to the EPA. I think it is a good idea.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Larger firebox, cleaner glass, durability (people don't want to have warranty

claims), consumer features.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: Emission factors for fireplaces were a lot too high.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: Gas logs.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: Probably wax logs can be formulated to give reduced emissions.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: Masonry heaters have counter flow arrangements and more restricted air supply .

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: Fireplaces can't compete if a standard is on a g/energy basis. There is more to life than heat. Some could argue that fireplaces should be treated differently.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: Yes, central heaters merit further evaluation. I don't know how many models are available. I think EPA has done some work on them, but I do not know any results. Yes, they should be certified. They are in danger of becoming extinct if they don't wind up with a certification program.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: OK regarding PM factors. The efficiency numbers are reasonable.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: Pellet stoves are inherently clean burning unless there is something very bad about their design. I am not concerned about regulating the currently uncertified units unless their field emissions are bad compared to certified stoves.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: No comment.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: The EPA standard should be improved, since it will be a long time before it is replaced by something else. In the long run I hope the ISO effort becomes a standard and the US adopts it.

6. Correspondence between in-home and laboratory emission test results.

6.1 *How accurately do certification tests predict in-home performance?*

Response: Correlation is very poor.

6.2 *How would you design research testing in the laboratory to simulate in-home use?*

Response: Use of reasonable volatility cordwood fuel, reasonable coal bed size, and a range of burn rates.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Response: Coal bed size, can't give a number on that.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: I think this is a subject for discussion and an open review.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?*

Response: (None)

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: No, should calculate the hydrocarbon number, estimate the value from the concentration of carbon monoxide in flue gases.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: No.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: Yes.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: Eliminate 5H.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: The precision of 5G is about +/- 2%. The relatively poor precision of 5H is an additional reason to eliminate 5H.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: 5G, aluminum front filter holders, also dual train approach for 5G should be required for good QA.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce*

as much emissions as a conventional stove. — Comments?

Response: Not a good answer for that; could be less than 5 years, could be more.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: Homeowner training is an excellent idea. A paid-for-up-front inspection/replacement program is not a good idea.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: Good idea, if stress test does a good job in predicting failures that actually occur in the field for specific models. The test would need to be confirmed before it is required.

10.2 *Should a stress test be made part of the certification process?*

Response: Yes.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: There are much field data that could be looked at. Existing lab and field data could be analyzed, or new data generated.

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: Field data exist and could be reviewed, but I don't know if anyone has done it.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: Routine maintenance of catalytic stoves will reduce emissions from some models, but have little impact on others. Routine maintenance of non-catalytics will also provide some emissions reductions. Same applies to pellet stoves.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Yes, definitely yes for the training manual. But a maintenance program should not be part of the purchase price for catalytic stoves. The most effective solution to poor field performance is intelligent local intervention triggered by excessive smoke.

12.3 *What would the key elements of routine maintenance be?*

Response: Inspection, cleaning, and repair.

Robert C. McCrillis - Mechanical Engineer, U.S. Environmental Protection Agency

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: I think they are for new installations, and of course that doesn't account for any degradation. And I suppose it's possible that some of the newer, I mean all these tests were done on stoves that were built in the early 90's. So maybe some of the newer stoves might do a little better.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: Well I think they are, again for new installations. I have a suspicion and no way to prove it that maybe since the manufacturers use these default efficiencies there is no incentive to make a stove efficient. And I think stoves burn better when you throw a little more heat up the chimney, so the actual efficiencies may have actually gone down.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I don't know about the catalyst itself; I just don't know, but there may be some more attention that could be paid to the design of the way the catalyst is installed so that it doesn't get overheated.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: We don't have very much data at all; the only thing that I have seen are the data that you did. It may be reasonable. It may give you some gain or some reduction in the emissions, although the data are showing what, 20 to 30%. It is a more uniform fuel. I don't know if anybody has looked at any other potential pollutants that might be coming out of wax logs. Personally, I wouldn't make a big push to try to get the EPA, lets say, to recognize them as a way to get some emission reduction.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: The little bit of testing that we were able to do here in our lab with that prototype, it seemed like it ran a lot hotter, and in some respects that was good, but then in other respects that was bad. When you threw a load of wood into that stove it retained a lot more heat, so that it tended to drive off volatiles fast and overwhelm the secondary. I'm sure it can have an effect and I suppose the effect could be good or it could be bad.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: Again, I think the EPA little gas burner would have helped to get that secondary going quicker, especially on the non-catalytic. It probably wouldn't have been applicable to a catalytic stove, unless you could use it to preheat the catalyst or maybe use a catalyst that is preheated electrically. As far as using some kind of a starter fuel, I don't know--I suppose it might if you could get people to do it.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: I think it would be a good idea. I wouldn't begin to want to try to develop the test method for it, but I think it would be a good idea.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: Well I think so, but again, it's a pretty small data set.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: I agree with you.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: During the wood heater Regulatory Negotiation process, the Committee could not agree on an efficiency method. When the regulation was promulgated, EPA stated that Appendix J, to be proposed separately, was an optional procedure for determining efficiency. Appendix J was proposed (see question) but never promulgated. I wish that the Agency would go ahead and promulgate the method and also do away with those default efficiencies. If a manufacturer wants to quote an efficiency, then he has to have it tested for efficiency by the proposed Federal Register Method.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Yes, I think that is especially true for the non-catalytic technology. I think that the Aladdin type design and as it's been copied and improved on, I think, really made a big improvement on the non-catalytic technology. As far as catalytic technology, I don't really know; I don't have much experience. I have the impression that the life of the catalyst is probably improved since the first stoves, because the earlier ones had the other substrate that crumbled, and you know they did away with that. I don't know about the catalytic stove technology, if that's changed that much. I don't think there has been a lot of change in the catalyst wash coat.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: Well, that is hard to say because there is so little data. It's based on field data, but that's such a small data base. You really can't comment on how reasonable it is; there is just so little of it.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: What little bit of testing we did on that Majestic, it seemed to burn quite a bit cleaner.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: That I don't know.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: I have always thought of a masonry fireplace as being a regular conventional open fireplace that you burn for the aesthetics, sucks all the heat out of your house. And a masonry heater is one of the European style massive units that stores the heat in the masonry and releases it into the dwelling all day long. I think there is a lot of confusion about those definitions.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: I agree and it would force the fireplace designs toward a more closed unit with heat recovery.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: In some localities I think these furnaces are a problem; I don't know how many are commercially available. I think I can name off six or eight companies and each one makes several models, but I don't know what the total market is, maybe 10,000 - 15,000 a year. The little bit of testing that we did here, says that they are probably on a par with a conventional wood stove. The way those things work, they have a thermostatically operated draft and when the thermostat shuts off the draft closes, so you get this real smoldering burning situation. Secondary combustion technology probably wouldn't work. Possibly a catalytic technology would, but I

just don't think it stays hot enough in there. I guess that really depends on the impact.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: I assume they are reasonable; I've done a variety of stoves in homes but, how many stoves all together? I don't know, maybe six, eight. Pretty small data base.

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: Yes, all pellet stoves should be affected facilities and not subjected to that 35:1.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: I don't know because I haven't tested any of them, but it's my impression that they have become more reliable, more bells and whistles on them, automatic lighting and things like that. The reliability thing has probably gone way up. It's good technology. If people want to burn wood, I would like to see more of them choose pellet stoves instead of cordwood stoves.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I think ideally the EPA and the ISO should be the same, or be directly correlatable. But from an economic point of view, I don't think that it's reasonable to ask U.S. manufacturers to retest all their stoves because of a change in procedure. And yet

I can see where the international people don't want to just adopt EPA's method. It's not to say that the EPA rule can't be improved, it certainly can and that's why we're doing what we're doing today. But I don't think it should be done in a way that the stove manufacturers have to retest or redevelop stoves, or go through the development phase again and all that. Well you know a ten year cycle wouldn't be a bad way to bring in a new revised procedure; I don't think that would be too burdensome on the industry.

6. Correspondence between in-home and laboratory emission test results.

6.1 How accurately do certification tests predict in-home performance?

Response: It's my impression that it's only in a gross sense, the certified stoves burn cleaner in homes than conventional stoves. But I'm not sure that if you rank the certified stoves from lowest emission rates to highest, I don't think that same ranking would come out in in-home tests. But we don't really have a big enough data base to say that either. You'd have to have 50 homes all burning each stove model, before you get enough statistics to draw a conclusion, because there is so much variation from one home to the next.

6.2 How would you design research testing in the laboratory to simulate in-home use?

Response: My only suggestion there is if we could come up with a more typical home use cycle, then that's what we should use in research testing and in certification testing. I don't really know what a more typical home use cycle would be.

7. EPA Method 28 strengths and weaknesses.

7.1 Method 28 is in part an "art". Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?

Response: You know we did so much testing on that one stove here that we just found that it had enormous effect on emissions, just in what we did in the pre-burn--before we even got to the one hour pre-burn, the regulated one hour. Nobody would run a stove the way we ran it; you wouldn't do that in your home. To me that's just not right. I understand that it gives you good numbers and it's fairly repeatable and all that, but it's just not realistic.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: I don't really have any feel on that. Maybe it should be revised, but I don't know what data to use to do it.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a "predictor" of the air-to-fuel ratio?*

Response: I'm not really familiar with that; I know you talked about it. If it's an error, I think it should be fixed. Is it going to make a big difference to the whole certification? I just think that it should be fixed.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: Again, if it is something in error it should be fixed. Do most labs already measure hydrocarbons? So you'd be requiring them to buy a total hydrocarbon instrument.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: Yes, we really need to update that correlation. We generated a lot of data here in our lab at a very low emission rate, where we measured both 5G and 5H. And we should redo that equation. At higher rates the Federal Register equation for 5G ends up higher than 5H, but the data show that is not true.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: Well maybe if the correlation equation was improved or updated then maybe that perception would go away.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: Whatever we said about Method 28A, I think applies to 5H.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: I don't really have a comment on that.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: We did a lot of 5G work here and it seemed that the one variable that we didn't have good control on was the filter temperature. Sometimes, depending on the stove and the burn rate and all that, it would get pretty high and sometimes it would be way down below 90°F. You know that's going to affect how much of the organic condenses. 5H has so many opportunities for error, with tracer gas and all that, it's much more complicated. I think it would be good to standardize, getting away from having to convert 5G to 5H.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: It's certainly my observation that catalysts degrade, and in some stoves they degrade rather quickly and in others they don't; they degrade slowly. I shouldn't say just the stove, but in some home/stove combinations. I don't know how to get at this business with degradation, because it's almost guaranteed that after a few years the stove isn't going to be as clean. And it seems that some sort of maintenance procedures need to be mandated. I think everyone knows that any manufactured thing degrades, so maybe it's something the industry needs to try to advertise and sell. Include something in there about town ordinances. Somehow it seems like this needs to come from the local community level, radio

announcements and things and the industry can play their lobbying role about how important this is and kind of work with the regulators and maybe over time it could become a routine practice.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?*

Response: Catalysts do degrade. At the time of the sale of the wood stove the homeowner or purchaser might be made more aware of what is required in the way of annual maintenance, what's important so the stove would stay burning clean. Maybe include in the purchase price a one year or four year maintenance check, or something like that. Make a big deal out of the maintenance check part. Most people don't want to even think about it, but it needs to be done.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: I always thought that a stress test was a reasonable approach. Maybe the test that the late Skip Burnett (EPA-600/R-94-193) came up with was a little too vigorous. I would like to see it included somehow. You have to break in the catalyst before you test the catalytic stove. Maybe the break in they have to do is the stress test. But then we'd have to agree on what a stress test is.

10.2 *Should a stress test be made part of the certification process?*

Response: I think it should. You could say that the manufacturer has to do this on his own, but is he really going to do it? The homeowner might not even know that something was wrong. If the catalyst isn't working, he's not really going to know

that unless he sees the smoke coming out of the chimney and realizes or remembers what it was like two years ago.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response to

11.1 & 11.2: I don't think this really can be done without a tremendous amount of test data. You can look at existing data statistically and see there is a difference between wet and dry and a difference between oak and pine, but trying to put a number on it would be very difficult.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: Yes; I don't know what routine is, but maybe once a year or every other year. More relevant for catalytic stoves, but there are parts of non-catalytic that can deteriorate and fail too. Yes, I'm sure it would.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: I think they should. I think that should be a more important part of the sale than maybe it is. That might not be a bad idea, if the dealer just includes it in the cost, but then the customer might ask for the cost without the maintenance program. And then if there is no law saying he has to do it, then the dealer will have to

bargain.

12.3 *What would the key elements of routine maintenance be?*

Response: Clean the stove inside. Inspect and repair any cracks in the metal. Remove and clean the catalyst following the catalyst manufacturer's practice. Replace door and window gaskets, if they need to be. Replace the bypass gasket, if there is one. Repair any standard damage to the brick or the firebrick lining. Check the bypass seal and hopefully be able to repair it, but there will be times when you can't. Straighten and replace warped parts, again, there're going to be situations where this is just not feasible. Inspect and repair the chimney system. Then run the stove and make sure everything runs right, the catalyst lights up, secondary burn and all those good things.

Ben Myren - President, Myren Consulting, Inc.

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: I think the 18.5 g/kg factor for conventional stoves is low, particularly for the West Coast stoves that we know so well--probably by a factor of 2 to 3.

Question: *What about the blend of conventional stoves that are out there right now--non-catalytics?*

Response: I think some of them have been replaced. One of the things that I ran into when I was down at DRI this year is that they have an old conventional stove, but it had developed a leak and getting it to burn at extremely low airtight burn rates was virtually impossible. I think there are a number of units that are around doing that; how many and which way that affects the emissions is hard to say. Probably with more air it should tend to burn somewhat cleaner, but I don't see the basic inventory changing.

Question: *What about the non-catalytics and catalytics, certified?*

Response: I think those are reasonable. I think, again, we have limited data. Some other data are in that range. I'm kind of ambivalent on that one. I think that if there are reasonable numbers to deal with for the whole population of stoves that are out there, I would like to see it redone only with stoves certified to the State of Washington's 4-1/2 gram standard included to see if that makes a difference. I don't know.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: I think that those are low. I think that 68%, because of the combustion efficiency necessary for 4-1/2 grams and 1 kg an hour burn rate, I think 70% would be a more real number.

Question: *OK, what about the catalytics--that was the non-catalytics. What about the catalytics?*

Response: I think that is low as well. I think catalytic stoves, if they are done right, should be in the high 70's, 77-78%.

Question: *What about the conventional; do you think that one's on the money?*

Response: I think that one could be all over the map. I think it's a reasonable number. I don't have that much experience with those stoves to really tell you.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I believe it can. The problem that I see with catalyst technology is that it doesn't have aesthetic qualities that the consumers tend to be looking for. That's why non-catalytics have sort of garnered the largest share of the market, the major share of the market. And then there is the replacement cost of the catalytic technology. I think the non-catalytic people have oversold that, because what they implied was that if you buy my stove you will never have to do anything to it and it will work forever. The big thing is that you don't have to replace the catalyst. And I would hope that the catalytic manufacturers, themselves, would be hearing what was said here and say, well we got to make our product better so that the replacement cycle is not as frequent. I don't know if that's even possible, but that would be my message to them.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: Yes, what you would get would be EPA appliances. I think that really that issue is kind of a bogus issue--well it's not a bogus issue, because that's the world we live in. But, I think what you are getting out of the wax fuels is a fuel release rate that more closely approaches that and, probably, exceeds it a little bit that of the fuel crib that we are using for EPA testing purposes. We know there are some problems with that, but if you approach that, then you should be clean. Whereas, cordwood tends to run the other way in terms of its air-to-fuel ratio.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various densities can reduce particulate emissions. How big an effect can this have?*

Response: Lots, but it's stove specific. Not even when you have a stove line, you have mama bear, papa bear, and baby bear, you can't make the assumption that by putting a different brick in baby bear it's going to have the same effect as in mama bear or

papa bear--it doesn't work that way. There are some advantages to denser bricks. There are some advantages to lighter bricks. It's the mix you have to deal with, from a design point of view. I used to be a real fan of pumice bricks, but I have used them long term now, and they tend to degrade with time as you scoop the ash out and your banging cordwood in them and stuff. They just kind of tend to disintegrate and go away. I don't think anyone has ever talked about that. They are replaceable so the question then becomes, how many people actually do it? I don't know. That would be an interesting study; I think, to do an in-house maintenance check on 100 non-catalytic stoves, generic, and just see how many doors leak, how many baffles are right, etc.--just to see what happens. It would tell you a lot about what's really going on in the real world. That would be great information to feed back into a design situation, in terms of what's going on. And, the manufacturers get some of that through their warranty process--I'm sure.

- 1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: Definitely. I don't know if it's as high as you think it might be. But, I've done some work where I have actually run tests, gases and temperatures, and I measured particulate emissions, using a Condar sampler, from kindling to the first warmup, second warmup, to the third warmup, which was essentially a temperature equilibrium situation at the end of a third warmup. And, this was just using 2 x 4's and watching what happens to emissions--and to no surprise, as the stove got hotter the thermal incineration tended to take over and the emissions went down. I found out that the kindling itself, the way you split it and how you lay it and the size of the kindling pieces themselves can make a huge difference in what happens in terms of emissions. That is something that we need to focus on. I don't know how we put that out. Perhaps something like a HPA thing where we do an informational video, do it in the lab, and then have people watch it; they could take it home. Make the videos available through HPA and they can use it in their store and they can show people how to build fires.

- 1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: I think that it should be subject to some type of certification, even though they weigh more than 800 kg. This brings me to the overall question. Eventually, the industry is going to have to come to the realization that we don't care from EPA's

perspective. EPA should say, “We don’t care what you build. We don’t care what the burn rates are, as long as they are advertised appropriately. You can’t misrepresent what you have, but build whatever you want as long as it burns clean.” That creates some real opportunities, particularly for the people in the fireplace industry, to get away from this 5 kg/hr product that is a safety nightmare. I don’t think anyone should be exempt, period.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: I don’t know. I have never done any work in that area.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: I agree. The whole process of burning wood is useable heat. At least in my mind it is. These people that talk about aesthetic burning; that’s fine, but why bother.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: True. Particularly for the 4 ½ g/hr stove population. How can they have increased the percent combustion efficiency and not the percent overall efficiency? I don’t see how one could happen and not the other, if you know what I’m saying, the inescapable byproduct thereof. I am neutral about the use of an efficiency program.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Yes--and I think emissions have gone down; combustion efficiency and percent overall efficiency have gone up. And I think the other thing that has happened as a better byproduct of the warranty process is we have learned a lot about how to build stoves that can take care of, or handle, over a relatively long period of time,

the durability thing. We are not there yet but we've come a long way. We are still learning as we go along. And that's true of everybody. It's true of people who are making plate steel stoves, for people who are making cast iron stoves, and there are a whole range of issues that each has had to deal with.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response Here again, I think the fireplace emission rate is low. I remember numbers that were slightly higher than what you guys show. When you show it on a kg/hr burn rate, or g/kg, that's somewhat deceiving, because if you have a fireplace where your burning 5 kg/hr of wood in the fireplace versus 2 or 3, it really changes the emission rate. And I think that fueling thing with fireplaces is kind of a hard one to grab hold of, because they vary so much in size and everything else. I don't see any reason to doubt the data, but my gut intuition tells me it's low.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: You bet. I think fireplace needs to be redefined. Looking ahead to where we have to go as an industry, fireplace is a definite category product. Masonry fireplaces are one thing, zero clearance fireplaces are another. The reason that I say it needs to be redefined is they need to have a very simple definition, so if they ever do set an emissions standard for it at a national level, we know exactly what it is that we're talking about as far as product. To me fireplaces are units where the burn rate is based upon the fueling rate; there's no air control in it.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: No comment.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: I think the big thing there is the masonry heater has some sort of heat exchange, physical apparatus built into it, a longer smoke path, etc. Where fireplaces are, generally, up and through the throat and up the chimney and away she goes, with

no thought to heat exchange. There's probably gray in there somewhere, but very little.

- 2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: I agree. To me what they should say is it's so many g/hr, at such and such an efficiency, which translates into so many g/MJ, or kW. Pick your number or your unit. I don't care what it is, but that would give an intelligent consumer the ability to understand all the numbers. Advertise whatever they want, as long as it is true numbers--none of this hokus pokus stuff.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

- 3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: I don't think they should be exempt for any reason. As to the rest of it--are there emissions data for them? I suspect there are. Should they be certified? Yes they should be certified. Nobody should be exempt from the process.

4. State-of-the-art of pellet-fired wood stove technology.

- 4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: I think there is a difference for stoves just based upon their air-to-fuel ratio, whether they are an affected facility, certified product or a non-certified product--I think, breaking it into two groups would provide more accurate numbers.

- 4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: I agree, no more loop-holes. The new technology stoves that are coming on the market are going to be totally new critters. I don't think that turning down the air-to-fuel ratio, to make it whatever it is, should get you out of the loop. Some of those suckers have got to be just filthy. I mean you look at the flame. I've seen them burn at the trade show; you know, the glass is sooting up on the edges. You can just see it.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: I think technology has improved, is improving and will continue to improve. I think the efficiency thing drives it, because the cost of pellets is going up, and I think the warranty thing drives it, because nobody wants the headache of a pellet stove that doesn't work right.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I don't want to see it go to a calorimeter room. I think that's a horrendous mistake, in terms of cost and complexity. Should the EPA methods be replaced by, or made comparable to an international standard? I would hope so. That would give everyone a level playing field on which to compete in different markets. I would not object to that happening.

(Additional response submitted 12/01/98): I do want to add some additional comments to my response to question 5.1 on the ramifications of ISO 13336. When I originally responded, I had read the ISO standard but hadn't worked on any stoves that had passed it. Since then I have had the opportunity to work on three different units from two different manufacturers that had passed the ISO test. None of these units would come close to passing the EPA test without substantial modifications. However, I have been told by manufacturers (clients who have taken EPA certified stoves to Australia to be tested) that the EPA certified stoves have little or no trouble in passing the ISO test.

I have also been told that units can be taken to the test lab without any prior R&D testing and made (or helped) to pass the test by varying the air flow through the

calorimeter room. I do not know of one EPA certified unit that made it through testing without substantial R&D testing prior to the trip to the lab for certification testing.

The units I worked on all had a forced air (fan driven) secondary air supply. You vary the fan speed with the burn rate setting, i.e., off for low, on high for high. Since there is no Fan Confirmation test, one has no idea if the unit will burn cleanly with the fan off, particularly on high. Furthermore, they are allowed to burn off 20% of the test fuel weight at the start of the test before they shut the unit down to the run setting. This results in minimum burn rates that are in our medium high category, which is much too fast of a “low burn” for a lot of the US market. And the fuel load does not have to be loaded parallel to the longer dimension of the firebox (e.g., if the box is 20” wide and 16” deep, you can load the test fuel parallel to the shorter dimension). This, in my opinion, runs counter to what would happen in the field, because very few people are going to spend the extra time to cut 16” fuel when they can cut 20” fuel and get it in the stove. Thus, the air flow would be wrong.

The one thing I do like about the ISO test is that it uses cord wood. However, since the test fuel is hardwood, there would probably be some changes in the combustion air supply ratios, amounts and distribution.

Having said all of that, I guess my major comment would be that we need to approach the adoption of the ISO standard very carefully and knowledgeably. It is not necessarily the panacea that we might think. But I do support the idea and effort that there should be one standard emission certification test used world wide. The same is true for overall efficiency.

6. Correspondence between in-home and laboratory emission test results.

6.1 How accurately do certification tests predict in-home performance?

Response: I think it’s stove dependent. We always tend to compare in-home performance with the weighted average, which is really not an apples to apples comparison. We need to compare the in-home burn rate number with a sort of a weighted average or a comparable burn rate, based upon stove emissions in the lab.

6.2 How would you design research testing in the laboratory to simulate in-home use?

Response: Eventually we’re going to have to open up the NSPS and deal with some substantive issues in it. And I think the two big ones that I see right now are: a.)

the fuel crib, and b.) the freely communicated stack in a warm enclosure. Those two are the major ones I think that upset the real world--make what we do in the lab less real world.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an “art”. Fuel loading density, fuel moisture, fuel characteristics (old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?*

Response: It's stove dependent and it's also burn rate dependent, on that same stove. And it is an art. It is a black art, unfortunately. I think while we may be able to eliminate some of that, I think the fact that wood is a non-uniform product that you are dealing with, and you have a wide range of variables that you are dealing with, so that that's always going to be there to some degree. I don't think you will ever be able to get rid of it. I think you can eliminate some of it, but never totally get rid of it.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: Here, I think some more data would be helpful. I would think that we would need to be population weighted. By that I mean, if you base everything upon Montana and North Dakota, where nobody lives, versus the I-5 corridor, where a lot of people live, I think you would be producing stoves that would be great for 1% of the population and not so good for the rest of the world. I think you need to look where the people live. Not only does it need to be a heat demand thing, but it needs to be population density weighted too. The East Coast is much more populated than the West, particularly the Great Plains, Northern Mid-West versus the Southern States. It needs to be looked at, but it needs to be addressed intelligently. That would be the only way to do it. That would just take some design work up front, and then you could do it. A lot of that information, I'm sure, is available. To me this is a number crunching exercise. You've got a lot of information and you put it into the computer and you come up with whatever it is you are looking for. The input will, of course, determine the output.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error.*

The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a “predictor” of the air-to-fuel ratio?

Response: That should be corrected. Nothing should be left uncorrected. If you know something is wrong, then it should be fixed. To me that is a given in life.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: Yes, yes. I don't know where EPA came up with the numbering in the first place, but I don't think it would be that difficult to do some work on some 4.5 gram stoves and figure out what the correct HC mole fraction of EPA stoves really is. Do the same for the 7 ½ gram stoves and then use it accordingly, and I think you're going to find it's going to be burn rate specific. If you are under 1 kg/hr you're going to have this, at 1.25 to 1.9 you are going to have that. I don't think there is a number that you could apply as an average to each burn rate, because the HC fraction is dependent upon the emission rate. Just look at emissions and M5H back half catches. I think that it's that burn rate and emission specific. I suppose we could use FID's, but that would be tough--I would not want to do it.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: Yes.

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: Yes, that would be fine if it was excepted internationally. I think we have to talk about the room setup and all of that, the full picture of what we're proposing to do before we decide upon what to do. I think one of the things about 5H, it's a tougher method to run. We know there's an error in the hydrocarbon thing, if that were corrected the error might go away. That might take care of itself, because

from a laboratory point of view, everyone would automatically go to 5G. But, 5H is more appropriate for other reasons.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: It should be corrected

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or non-catalytic) emission limits. — Comments?*

Response: How many of those stoves that are within 20% are product lines that are still being made? A lot of people have products on the list, but they aren't making them anymore.

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: There's a ton of stuff that could be done there. EPA, they could take anything and make it hard to do. How, what and why they do that is beyond me, but some of the stuff that they require, calibration and documentation, are utterly and totally nonsense. That's the kind of requirements that should be ejected. Focus on what really counts.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: I think that's true. Since most catalytic stoves were designed to be "creosote" cookers, which was what the old conventional air tight stove was. I would say they are probably just as bad when the catalytic combustor doesn't work.

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made*

in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?

Response: I would say there were designs available that did not seem to have a problem and those designs still around today. I think the same is true for non-catalytics. I don't see any reason to exempt non-catalytics from inspection and maintenance, or make it any less rigorous for them. You just have to look at different things. Baffle warping, leaking air wash. The air wash gap is critical. Anything that moves through the use of improper steel or welding or whatever. All bets are off, emissions wise and I've been through that personally.

Question: *Let's see; is it reasonable to require homeowner training?*

Response: I don't see any reason why that shouldn't happen. I guess my question would be to the dealers, I hope they are doing it. When you are selling stoves to some place like Home Depot and you get a sales guy back there who knows anything about a wood stove, you're lucky. I don't know how to go about reaching those people who, other than, it's part of their operating permit they have to go to a two hour night class where people talk to them about how to run a stove properly. If the dealer could do it through the inspection and maintenance program, so much the better. We should try to keep the government out, if we can, and have the industry guys do it.

Question: *What about incorporating the costs of an inspection and catalyst replacement program?*

Response: I don't have a problem with that. I would think that could be left to the local people. I wouldn't have a problem with it as long as it was across the board, played off fairly. I think that people should try it — fiddling around with that and see what happens from an airshed to airshed point of view, in terms of improvement and find out what works. I think that is one distinct possibility.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: I think there are two kinds of stress. I want to call them acute and chronic. What acute is is what you'd get with what the late Skip Burnett (EPA-600/R-94-193) did. Chronic is more what happens to a stove, due to a large number of cycles of warming up and cooling off, warming up, cooling off that happens during normal operation. I think you'll get some of the chronic effects with an acute kind of a test, but I think it maybe overkill in some instances and it may not even come close to documenting what really happens in the real world. How you'd balance that out is tough.

When we have stoves come through our lab, if we see anything that might be a potential durability problem for that particular stove and that manufacturer, we start talking to them about it right up front right then. In the way we run our R and D program with my clients, is that hopefully, by the time we are through developing a stove, that stove has been cycled enough times that if there is something blatantly obvious that would show up, like in the kind of work that Skip Burnett was doing, we've kind of gotten through that. What we do everyday is we run the stove up to, basically, maximum heat storage and then we start our test from that. We've got a warmup period that is anywhere from 3 to 4 hours a day that's wide open. Then we shut down and cool it off. Well, if you cycle a stove like that (to do an R&D project on a wood stove is probably a minimum of 90 days, more like 6 months, if you want to know the truth), you've really put that stove through its hoops.

So to make a stress test part of the certification process, you'd have to convince me that that kind of a development process was not sorting things out, as far as durability is concerned. We know for a fact that one thing or another, can or cannot happen, and once the manufacturers are well aware of those issues and they don't want to get into a certification series and suddenly find that their air wash gap has changed because of one thing or another, or so it goes. In some ways I would like to see some good 4.5 gram stoves, non-catalytic stoves be put into the field and monitored in the same way that the early stove studies where done. And do it for a number of years.

10.2 *Should a stress test be made part of the certification process?*

Response: Only if you could demonstrate through the field studies that we haven't got our basics covered. If you took some brand new stoves out into the field that were current products, 4.5 grams or better, and looked at what they did. Cast iron stoves should be included in that field study to see if they, because of the nature of cast, do better or worse. My gut reaction is they should do better.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: Given the EPA thing, when most of our fuel loads are somewhere between 17 and 18%, that's just where we tend to be. Can it be isolated from other variables? That be a tough one. I think you could do it, but it would take repeated tests, because I don't know how you would dial out barometric pressure. And we all know that can have a tremendous impact. Could it be different for wood from different species? You bet it would. Pine has a totally different emission profile than fir, larch or oak. Having said that, how do we deal with it? I haven't got an answer for that.

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?*

Response: Yes, I don't know of any data, other than some work that EPA's Robert C. McCrillis did, that would document emission factors from different tree species.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: I think it would and I don't think it's more relevant for either stove type; I think it's across the board. Catalysts probably have the most potential for having emissions sky rocket particularly, if the catalyst doesn't work; non-catalyst stoves, if something happens if the door leaks. If you upset the airflow inside a non-catalytic stove by very much, things go downhill very quickly. I think pellet stoves should be kicked in there too.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: Yes, I think here the stove stores should really, as part of the sale for sure, you take them over and say hey got a few things that I'd like to show you about how to make this stove really work. It's part of the sales pitch. I think it needs to be done, I'd like to see the local stove shops do it. If they give tickets out for smoky stoves that might be part of the penalty to get your ticket fixed you have to have someone come out and go through your stove to make sure something isn't wrong with it and be told and shown how to run it properly.

12.3 *What would the key elements of routine maintenance be?*

Response: Bypass gap, outside air kits installed properly, air wash gap, window glass seal, ash door seal, secondary combustion stoves that have tubes (or any other way of doing it), secondary system mounting system is intact, good baffle, no warpage, insulation, no wear, bricks are all there, baffle is not scaled. The list goes on & on.

As for the rest of the testing issue, I see the need to do a high, low and perhaps a mid range run on each stove being tested. Problems always seem to occur at the margins, rather than in the middle. At the same time, I would eliminate all reciprocal certifications and the fan confirmation test. If a stove has a fan as an option, then you would do a high & low with the fan on and with the fan off. A fireplace insert would be treated the same way as would the change from a leg to a pedestal model.

Michael Van Buren - Technical Director, Hearth Products Association

1. State-of-the-art of wood stove combustion and emission control technologies.

1.1 *Are in-home emission reductions as compared to conventional stoves shown in Table 1 for catalytic and non-catalytic certified stoves reasonable?*

Response: There are differences in catalytic and non-catalytic stoves. The conventional stove is probably low; the pounds per gram or pounds per ton were probably a lot higher than that. You can see dramatic reductions using densified logs in EPA certified appliances in the field.

1.2 *Are efficiencies shown in Table 2 for catalytic and non-catalytic certified stoves reasonable?*

Response: I think that there is a variation from stove to stove. That is a hard number to give, since there hasn't been a lot of efficiency testing. What would you put down here for a conventional fireplace? I think what we will see in the future is more outdoor air being used and less indoor air, and how that would affect the efficiency of the product.

1.3 *Can catalytic technology for use in wood stoves be fundamentally improved?*

Response: I would imagine that there are a lot of things that can be done, but a lot of those things fall outside the realm of the EPA standards (i.e., natural and propane gas secondary combustion). The increased use of electronic control and larger catalysts could help, but all of these would also impact the cost of the stove.

1.4 *Is the use of manufactured fuel (densified and wax logs) a credible emission reduction strategy? See Tables 1 & 2 .*

Response: I think it is especially for the fireplaces. I think that it is something that has been overlooked in a lot of areas, particularly Phoenix. I don't think it was looked at as an option, or it wasn't conveyed as clearly as it could have been. More testing needs to be done to prove this.

1.5 *For non-catalytic stoves the heat retention adjustment with refractory material of various*

densities can reduce particulate emissions. How big an effect can this have?

Response: It does make a difference. How much of a difference, as far as better emission values, varies from stove to stove. I have limited experience with this at Hearthstone, we did do some work on a side loading door. Small modifications to a stove can have a major effect on emissions. Modifying the geometry of the stove, such as changes in the baffle or the baffle angle, can make a difference in emissions. Just changing the baffle insulation can affect emissions.

1.6 *Approximately one half of the particulate emissions occur during the kindling phase for non-catalytic wood stoves and more than half for catalytic wood stoves. Are there improvements in technology that can mitigate this problem? Can specially designed high BTU wax logs be used to achieve a fast start and reduce kindling phase emissions?*

Response: I'm sure using some type of fire starter would reduce emissions. Anything that touches off at a lower temperature is going to help. I think the two things that we run up against there is that's basically a usage strategy of the homeowner, and how do you control that? From a regulatory viewpoint, is using a wax fire starter considered a dual fuel action? It's a petroleum base product. Would EPA accept that under the present regulations? If they accept that, what other dual fuel options would they accept? And then whenever we start talking about electronic controls, we have to think about the actual market environment out there and purchasing stoves and what it does to the price of the stove.

1.7 *Should masonry heaters with tight fitting doors and draft control be classified as a wood stove and be subject to some type of certification even though most weigh more than 800 kg?*

Response: I don't think they should be classified as wood stoves, because of their usage. I think they could be potentially tested to some certification. The other thing is to look at how many of them are being sold and is it worth it? The answer may be no, because it's not a large volume product. I think there needs to be some proof of those usage patterns.

1.8 *Are the emissions and efficiencies for masonry heaters, based on in-home tests, shown in Tables 1 and 2 reasonable?*

Response: No comment.

1.9 *The OMNI staff feels the emissions per unit of heat delivered (e.g., lb/MBTU or g/MJ) is a more appropriate way to rank the performance of wood burning appliances than emission factors (lb/ton or g/kg) or emission rates (g/hr). — Comments?*

Response: You are now rating efficiencies and emissions. The question then becomes: should there be some type of control on a woodstove that's sensitive to room temperature? More work needs to be done on efficiency testing of wood burning appliances.

1.10 *Default efficiency values are used for wood stoves. This coupled with the fact that emission factors or rates (not g/MJ) are used to rank wood stoves does not provide an incentive for manufacturers to increase the efficiency of their stoves. — Comments? Should an efficiency test method as described (FR v. 55, n 161, p. 33925, Aug. 20,1990) be required to be used and the results listed?*

Response: Manufacturers have an incentive to build stoves that have good combustion efficiency through the EPA emission standard. Lowering emissions requires raising the combustion efficiency. Thermal (sometimes referred to as heat transfer) efficiency should go hand-in-hand with combustion efficiency. An accurate method for measuring overall efficiency (combustion x thermal) needs to be developed before implementing an efficiency standard.

1.11 *Have certified stove design and performance improved since the first certified stoves? If so, how?*

Response: Without a doubt, the certified stoves have improved dramatically. All you have to do is look at the emissions that are coming out of the stove now. Almost all the stoves on the market meet the Washington standard versus the EPA standard, as far as I know. And I think the durability of the stoves has improved. The warranty times are longer. It used to be a one year warranty on products, now it's three or five years, and that is a very good example of how they have improved.

2. State-of-the-art of fireplace emission control technology.

2.1 *Are the emission factors and efficiencies for the in-home use of fireplaces and inserts shown in Tables 3 and 4 reasonable?*

Response: No comment.

2.2 *There appear to be only a few practical design or technology options for fireplaces that will potentially mitigate particulate emissions. — What designs and technologies are available? What retrofit options are there?*

Response: I think this comes down to a financial issue and what the market will pay for, but I have seen electric afterburners that can go on fireplaces to lower emissions. I've seen designs that lower emissions, some type of secondary combustion through the same method as is used in non-catalytic stoves. I think there are plenty of things that can be done to lower emissions, secondary air in stoves; glass doors certainly help. It's just a matter of what is financially feasible on the market.

2.3 *The use of wax fire logs reduces emissions over the use of cordwood. Can the formulation of wax logs be changed to produce even less emissions?*

Response: I understand that wood wax logs produce less emissions than cordwood. I am not sure what can be done to further reduce emissions from today's wood wax logs. The other thing to mention here is that the material used to manufacture all-wood logs is generally cleaner than ordinary cordwood, so it burns cleaner and that can lower emissions.

2.4 *What are the distinctions between a masonry fireplace and a masonry heater?*

Response: Masonry heaters have a method of storing heat. They have longer passages. Some have downflow in them to give the flue gas a longer path before it actually exits, so you have a mass inside the home that can be heated. A masonry fireplace does not have these features.

2.5 *As with wood stoves, the OMNI staff believe that the mass of emissions per unit of heat delivered is a better way to rank the performance of fireplaces than emission factors or emission rates.*

Response: Given the study that was mentioned, 7% of the fireplaces are used as a primary source of heat in a limited area, I don't know if g/MJ is a reasonable way of measuring the emissions. I think maybe g/kg is a better way of doing it for a fireplace, because the usage is completely different than a wood stove. I think there is a distinct difference between fireplaces and wood stoves and their reasons for being used. I think their testing methods should be completely different. They are not used probably 99% of the time as a source of heat; they are used for aesthetic purposes. And therefore they should be tested accordingly, in g/kg.

3. State-of-the-art of wood-fired central heating furnace emission control technology.

3.1 *According to a Department of Energy survey out of the 20.4 million households that used a wood burning appliance in 1993, less than 0.3 million used a wood burning furnace as their primary source of heat. Are there enough wood-fired central heating furnaces in use to merit their closer evaluation? How many commercially available models are there? Are there emissions data for them? Should they be certified?*

Response: I think there are a lot of products that fall into that category, including probably masonry heaters. How many are being used, and is it worth regulating a small number across the country? I think there is good reason to have some testing. I don't think they should fall under the same test standard as a wood stove, because the way they operate and the way they are used are completely different. I think there are under 10 different manufacturers and there are probably less than that, and they probably have one or two models each being a different size. There is one pellet burner; that's all I know of at this point. I think there should be some type of testing on them.

4. State-of-the-art of pellet-fired wood stove technology.

4.1 *Are the emissions and efficiencies for the in-home use of pellet stoves shown in Tables 1 and 2 reasonable?*

Response: I'd say they are probably pretty reasonable, as an average. I think the question that comes up is, what stoves are above 35:1 air-to-fuel ratio? What do they emit versus a cleaner one?

4.2 *The 35:1 air-to-fuel ratio cut-off for certification has produced two classes of pellet stoves — those that are certified and those that are not. The latter class may have models that are less efficient and have higher emissions than the former. Should the regulations be amended to close the loop-hole and discourage the practice of intentionally designing models with a higher air-to-fuel ratio to avoid certification?*

Response: I don't know what that loop-hole does, whether it really affects the operation of the stove and the efficiency of the stove.

4.3 *Have pellet stove design and performance improved since the first models were introduced? If so, how?*

Response: Absolutely. I think some of the stoves on the market have improved dramatically, since the first stoves. Just in reliability, pellet stoves are much more reliable today

compared to 10 years ago. The basic materials used, the equipment used within the stoves have improved. Some now use microprocessors to control them.

5. Ramifications of ISO.

5.1 *The International Organization for Standardization (ISO) has a technical committee for developing emissions, efficiency and safety test standards for wood-fired residential heaters and fireplaces. (See Table 5 for comparison of the draft ISO method 13336 with EPA methods 28, 5G and 5H.) Do you feel that the EPA methods should be replaced with or be made comparable to an international standard?*

Response: I don't feel that the EPA method should be replaced with the ISO standard. I do, however, feel that the United States has to become involved in that ISO standard, if it starts to gain any strength. But I don't see the ISO standard having any effect on us at the present time. I don't think it's refined enough. If we get involved, then we could help shape it. If we wait, what's going to happen is we're going to get something imposed on us by the ISO that we don't like, and I think that is a bad alternative.

6. Correspondence between in-home and laboratory emission test results.

6.1 *How accurately do certification tests predict in-home performance?*

Response: I have not seen any information that shows anything between the two, so I can only speculate. I hope there is some correlation between a clean burning stove in the lab and a cleaner burning stove in the field. Are the numbers going to be close to the same? Absolutely not. There should be no assumption along those lines. But is the cleanest burning tested stove going to be the cleanest burning stove in the field?

6.2 *How would you design research testing in the laboratory to simulate in-home use?*

Response: I would get away from using dimensional lumber. I would try to use more of a cord wood and I would give more flexibility as to how the operator can work with the stove.

7. EPA Method 28 strengths and weaknesses.

7.1 *Method 28 is in part an "art". Fuel loading density, fuel moisture, fuel characteristics*

(old vs new growth, grain spacing, wood density) and coal bed conditioning can be adjusted within the specification range of the method to influence results. In your experience what things have the most effect on particulate emissions? How much influence can they have?

Response: There are a lot of things that affect emissions. And the first thing we come to is the low burn rate, and getting the stove to start up quickly, get flaming quickly and then once you get it burning that it doesn't burn too fast. Moisture content has a big effect, picking the wood, where you put it. It is an "art", and lots of different people will give you lots of different answers.

7.2 *Burn rate weighting is based on very limited data and the cities from where the data were obtained are not very representative of wood use nationwide (see Table 6). How can the weighting scheme be improved to be more representative of the nation as a whole?*

Response: I think that the weighting just continues the art of having the stove pass. Where your burn rates come in and do you make another run to try to get rid of that burn rate and what's the weighting factor, is what makes it more of an art than a science.

7.3 *The equation for the calculation of the air-to-fuel ratio as in Method 28A is in error. The error produces a small but significant difference in the calculated air-to-fuel ratio. Should the method be corrected or should it be left as a "predictor" of the air-to-fuel ratio?*

Response: No comment.

7.4 *The assumed mole fraction of hydrocarbons (Y_{HC}) is defined as a constant in the air-to-fuel ratio calculations in Method 28A. The mole fraction of hydrocarbons in the vapor phase will vary significantly with fuel and combustion conditions. Should hydrocarbon vapors (more appropriately, organic compound vapors) be measured as part of the method?*

Response: No comment.

8. EPA Methods 5G and 5H correlations.

8.1 *The comparison data to demonstrate the correlation between 5G and 5H are limited. Should the correlation between the two methods be reevaluated?*

Response: You can't look at just 5H and 5G; you have to look at its entirety. Should you really have two methods?

8.2 *It is the general perception that method 5H produces lower numbers than 5G. Method 5G is less costly and more precise than 5H. — Comments? — Should there be just one sampling method?*

Response: Having a single method makes sense.

8.3 *The same points regarding flow rate calculations (air-to-fuel ratio) and hydrocarbons as made for Method 28A are applicable to Method 5H. — Comments?*

Response: No comment.

8.4 *The precision of EPA's Method 5 is estimated as being about 20%. Almost one quarter of the 214 stoves listed as certified by the EPA as of 8/12/97 are within 20% of their respective (catalytic or noncatalytic) emission limits. — Comments?*

Response: I have looked at the list of 214 stoves and a lot of those stoves I did not recognize, and I don't know how many of those are still on the market. What are the factors that EPA built into the original test method to take that 20% into account?

8.5 *Based on practical experience with the 5G and 5H, how can they be improved?*

Response: Any way of taking it out of an art in order to make it a science would help.

9. Performance deterioration of EPA-certified wood stoves in the field.

9.1 *It is the opinion of many in the wood stove industry that catalysts last only five years and that a stove designed for a catalyst operated without a functioning catalyst can produce as much emissions as a conventional stove. — Comments?*

Response: Catalytic stoves need regular maintenance; are the operators keeping track of how the catalytic is performing and are they checking the stove properly?

9.2 *Field studies in Glens Falls, NY, Medford, OR, Klamath Falls, OR and Crested Butte, CO showed that emissions from some catalytic stoves became appreciably worse even*

after two to three years of use. Inspection of stoves in Glens Falls showed that catalyst deterioration and leaky bypass systems were responsible. Have improvements been made in the design of catalytic stoves to minimize these problems? Is it reasonable to require homeowner training on the proper use of catalytic stoves and/or to incorporate into their costs an inspection and catalyst replacement program?

Response: Stoves have become more user friendly; they are easier to use. They are now vertical instead of horizontal, so the ashes fall out. It is unreasonable to require training. There should be instructions, but not attached to the stove.

10. Stress test pros and cons.

10.1 *A short-term laboratory woodstove durability testing protocol was developed to predict the long-term durability of stoves under conditions characteristic of in-home use (see EPA-600/R-94-193). It was concluded in that study that damage occurs during those occasional times when a woodstove is operated in the home at exceptionally high temperatures. The laboratory stress test was designed to operate a woodstove at very high temperatures over a one to two week period to predict long-term durability under in-home use. Is this a reasonable approach?*

Response: No.

10.2 *Should a stress test be made part of the certification process?*

Response: No.

11. Feasibility of developing separate emission factors for dry and wet wood and for softwood and hardwood species classes.

11.1 *Optimum wood moisture for low particulate emissions seems to be in the 18% to 20% range. Are you aware of any data that will allow the impact of wood moisture to be isolated from other variables? Could it be different for wood from different tree species?*

Response: ISO doesn't take into effect the species of the tree. I don't know

11.2 *Wood from different tree species clearly burns differently. The chemical make-up and density of wood from different tree species is different. For example wood from coniferous trees has more resin than wood from deciduous trees. It is believed that particulate emission factors will be different for wood from different tree species. If this*

is true different parts of the country may have different emissions factors for residential wood combustion. Are you aware of any data that document different emission factors for wood from different tree species?

Response: I don't know of any data available.

12. Routine maintenance.

12.1 *Would routine maintenance of stoves once they were in a home reduce particulate emissions? Would this be more relevant for catalytic stoves than non-catalytic stoves? Would this be relevant for pellet stoves with electronic and moving parts?*

Response: Regular maintenance should be done, especially when there are moving parts.

12.2 *Should the home owner be provided with a maintenance manual or a training course at the time of purchase? Should a maintenance program be part of the purchase price particularly for catalytic stoves?*

Response: An owner's manual should be provided. No training should be required unless this same training was also required for gas and oil products, such as water heaters, furnaces, boilers. Everything needs regular maintenance.

12.3 *What would the key elements of routine maintenance be?*

Response: It should be looked at once a year to see if cleaning or maintenance needs to be done. The flue should also be cleaned.

Other unsolicited comments not in response to prepared questions:

- 1.) People [government regulators] who review the reports should be able to qualitatively assess them: does this make sense?
- 2.) They need to enforce the regulation to ensure that all players continue to abide by the rules.
- 3.) They need to welcome new technology and be willing to allow for changes in the methods as long as the results show that the product burns cleanly. Forcing everybody into the square or rectangular firebox fuel load configuration may eliminate some very viable technologies. In short, the NSPS should be technology enhancing rather than technology limiting. Right now EPA is preventing some very viable technologies from being developed.