

**From:** [Achman, Gregg \(HHT\)](#)  
**To:** [Dec Air Comment](#)  
**Subject:** Hearth & Home Technologies comments to additional testing to non-catalytic wood-fired heating devices  
**Date:** Friday, July 26, 2019 4:54:43 AM  
**Attachments:** [HHT Comments on AK Control Strategies 012619.pdf](#)

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Please accept these comments to the proposal to require additional testing for non-catalytic wood-fired heating devices for the Fairbanks air plan.

Regards,

Gregg Achman

**Hearth Expert**

VP Engineering Standards

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July 26, 2019

Ms. Cindy Heil  
Division of Air Quality  
Alaska DEC  
555 Cordova St.  
Anchorage, AK 99501

RE: Amendments to: State Air Quality Control Plan, Vol. II: III.D.7.7, Control Strategies, Public Notice Draft, May 10, 2019

Dear Ms. Heil,

Please accept this letter as the comments of Hearth & Home Technologies LLC (Hearth & Home Technologies or HHT) with respect to 7.7.5.1.2 Device Requirements – wood-fired & coal-fired standards being proposed as part of Control Strategies for the State Air Quality Control Plan.

Hearth & Home Technologies, headquartered in Lakeville, Minnesota, is the U.S. leading manufacturer of wood, pellet and gas-burning hearth products, including stoves, fireplaces and fireplace inserts. Our nationally distributed brands include Quadra-Fire®, Harman®, Heatilator®, Heat & Glo®, and PelPro®. We employ more than 1,200 employee-owners and have manufacturing facilities and distribution centers in Iowa, Minnesota, Pennsylvania, Vermont, North Carolina, California and Maryland.

The proposed revision to 7.7.5.1.2 Device Requirements – wood-fired & coal-fired standards is very concerning in that the proposal requires additional testing to already EPA certified non-catalytic wood-fired devices based on data from an unvetted experimental dilution tunnel measurement method using a tapered element oscillating microbalance (TEOM) to measure PM with no defined pass/fail criteria.

The TEOM is used for ambient air pollution measurement by providing continuous measurements of particulate mass concentrations, not for measuring PM in a dilution tunnel for a wood-fired device. To make the device “work”, NESCAUM altered the standard flow settings to compensate for the dilution tunnel concentrations versus the devices designed application of measuring ambient conditions. Also, filters must be changed frequently during a test to minimize negative or negatively biased TEOM PM measurements as further proof that the TEOM is not designed for direct measurement of emissions from a wood-fired device.

The proposal does not outline who is certified to run these tests. Current EPA certified labs do not have “modified” TEOM devices to run these tests as the TEOM is not recognized by the EPA as a PM measurement device for use in a dilution tunnel for the certification of a wood-fired heating device. Also, who is paying for this additional unvetted test method to already certified wood-fired devices?

The proposal does not outline, or prove, that the newly required testing of only non-catalytic wood-fired heating devices is going to reduce PM emissions levels for the air shed to ensure it adds value. Without data showing that these temporary “uncontrolled emissions” from some wood-fired devices impacts the air shed and adds value, it only adds another layer of added cost and complexity to an already EPA certified wood-fired heating device with no guarantees.

While HHT sympathizes with the need to get the Fairbanks airshed back into compliance, we do not support the proposal requiring additional testing using an unvetted experimental measurement method that singles out a category of wood-fired heating devices based on a limited set of data and the hopes that it may reduce emissions to the airshed. We encourage the State of Alaska and the EPA to not approve this proposal since there is no evidence that shows the value it would produce to the airshed.

Regards,

A handwritten signature in black ink, appearing to read 'Gregg Achman', with a stylized flourish at the end.

Gregg Achman  
VP Engineering Standards  
Hearth & Home Technologies