

From: [Heil, Cynthia L \(DEC\)](#)
To: [Smith, Rebecca J \(DEC\)](#)
Subject: attachment to comment - Feinstein (HPBA)
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Attachments: [HPBA Comments on Alaska SIP July 25 2019.pdf](#)

9) Comment:	Please find attached the comments of the Hearth, Patio & Barbecue Association (HPBA).		
9) Fiscal Impacts:	False		
9) Submission Detail:	07/25/2019 08:08 AM	http://dec.alaska.gov/Applications/Air/airtoolsweb/Home/ViewAttachment/16856399/v3QFzb9eyBmgTClqSiaKSQ2	Rachel Feinstein feinstein@hpba.org



**COMMENTS OF THE HEARTH, PATIO & BARBECUE ASSOCIATION ON THE
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION: FAIRBANKS NORTH
STAR BOROUGH FINE PARTICULATE MATTER (PM-2.5) SERIOUS STATE
IMPLEMENTATION PLAN**

18 AAC 50.077

July 25, 2019

**Cindy Heil
Division of Air Quality
ADEC
555 Cordova St
Anchorage, AK 99501**

The Hearth, Patio & Barbecue Association (HPBA) appreciates the opportunity to offer comments on the State of Alaska's State Implementation Plan (SIP) for the Fairbanks North Star Borough (FNSB) to enable the Borough to reach attainment to the National Ambient Air Quality Standard (NAAQS) for Particulate Matter 2.5 microns or less in diameter (PM-2.5).

Based in Arlington, Virginia, HPBA is the principal national industry association representing manufacturers, retailers, distributors, representatives, service firms, and allied associates for all types of hearth, barbecue, and patio appliances, fuels, and accessories, including solid fuel-fired home heating appliances such as woodstoves, pellet stoves, hydronic heaters, and warm air furnaces. The 2,500-member association provides professional member services and industry support in education, statistics, government relations, marketing, advertising, and consumer education.

We recognize that the Alaska Department of Environmental Conservation (ADEC) and the FNSB have struggled for years with an unprecedented PM 2.5 challenge, of which wood smoke is a significant contributor. Both national and local industry members and staff have invested time and resources in local education events and/or stakeholder meetings since 2011. In addition, we recognize the careful work Sierra Research/Trinity has contributed to everyone's understanding of the Fairbanks air quality issue and especially Tom Carlson's work on the Best Available Control Measure (BACM) analysis.

HPBA has two comments on the Control Strategies referenced in Section 7.07.

1. **We strongly support mandating that the installation of solid fuel appliances be performed only by professionals. We urge you to specify the National Fireplace Institute (NFI) as the certification program for all professional installers.** It is our observation that at least some of the early changeout funds were wasted because the FNSB allowed home-owner installations. Many of these "do it yourself" installations were done incorrectly, causing EPA-certified woodstoves to generate smoke due to improper venting and other errors that a professional would not have made. EPA's Burn Wise program recommends that all changeout programs use NFI-certified installers.¹ NFI's objective is to increase public safety by establishing meaningful credentials for professionals involved in planning and installing residential hearth appliance and venting systems. Proctored testing and courses are available online. With careful study, NFI certification can be obtained by any reasonable, effective tradesperson.
2. **We do not support the provision outlining additional requirements for EPA-certified non-catalytic stoves.** This provision is effectively a local certification system and should be removed from the SIP before it is submitted federally. The underlying test method for this certification program has not been reviewed by EPA.

¹ U.S. Environmental Protection Agency, Burn Wise Program. (2014). How to Implement a Wood-Burning Appliance Changeout Program. P. 6. Retrieved from <https://www.epa.gov/sites/production/files/2015-08/documents/howtoimplementawoodstovechangeout.pdf>

EPA has already established a precedent in this area which will likely trigger partial disapproval and would only delay federal approval.²

We would like to specifically address the section from page III.D.7.7-20 of the “Control Strategies; Public Notice Draft” document, which reads:

“Furthermore, non-catalytic wood-fired devices will not be allowed to be installed unless additional documentation is given to DEC. Woodstove device testing conducted by the Northeast States for Coordinated Air Use Management (NESCAUM) using tapered element oscillating microbalance (TEOM), which monitors and records emissions through the entire certification tests, demonstrates that there are uncontrolled emissions from non-catalytic wood-fired heating devices. See Appendix III.D.7.7 for charts that show a comparison between catalytic and noncatalytic woodstoves measured using the same EPA certified testing procedure as well as charts showing comparison using the same cord wood test.

Given the community’s desire and need for supplemental heat options, it is important to ensure that the devices used are as clean burning as possible. Therefore, in order for non-catalytic woodfired heating devices to be added to the approved list of devices for the area, certification testing must include use of a TEOM. The resulting emission profile demonstrating that emissions are being addressed throughout the certification test must be included along with other required documentation to the department for review and approval.”³

The memo accompanying this provision within Appendix III.D.7.07 indicates that the proposal is based on the preliminary analysis of a draft test method using TEOM.⁴ This analysis was performed recently and was made public for the first time with this document. The memo is dated May 6, 2019, which implies that the impact of this provision was not fully vetted and discussed by the local Fairbanks stakeholder group in the four-day time period between publication of the memo and the May 10, 2019 publication date of the proposed FNSB SIP. Further, we are not aware of any serious review of the information supplied to ADEC outside of NESCAUM. HPBA is not aware of any approval, or even review, of this proposed draft method by the U.S. EPA’s Measurement Technology Group. Since the underlying test method of this proposed certification program has not received EPA approval prior to its inclusion in a SIP, EPA’s precedent may well lead to disapproval.

² See Approval and Promulgation of Implementation Plans; Arizona State Implementation Plan Revision, Maricopa County. 63 FR 15303. (March 31, 1998).

³ Alaska Department of Environmental Conservation. (May 10, 2019). *Amendments to: State Air Quality Control Plan; Vol. II: III.D.7.7; Control Strategies; Public Notice Draft*. Retrieved from <http://dec.alaska.gov/air/anpms/communities/fbks-pm2-5-serious-sip/>

⁴ Alaska Department of Environmental Conservation. (May 10, 2019). *Amendments to: State Air Quality Control Plan; Vol. III: Appendix III.D.7.07; Appendix to Volume II. Analysis of Problems, Control Actions; Section III. Area-wide Pollutant Control Program; D. Particulate Matter; 7. Fairbanks North Star Borough PM2.5 Control Plan, Serious Requirements*. P. 180. Retrieved from <http://dec.alaska.gov/air/anpms/communities/fbks-pm2-5-serious-sip/>

Even partial disapproval of the SIP over this relatively minor, very preliminary provision will unnecessarily delay this document which has involved a great deal of thorough work on numerous provisions. This provision should be removed from the SIP prior to its submittal to U.S. EPA.

As always, if ADEC or FNSB have any questions, HPBA continues to make ourselves an available resource. We appreciate the opportunity to provide input on today's proposal and we look forward to reviewing the SIP when it reaches the Federal Register.