

From: [Andre Bibaud](#)
To: [Dec Air Comment](#)
Subject: Comments on Fairbanks PM2.5 Serious SIP; proposed new regulation for wood stove installation
Date: Tuesday, July 16, 2019 11:42:40 AM

Dear Ms. Heil;

We are a residential wood burning appliance manufacturer who has been selling in Alaska under the RSF brand name for over 20 years. I'm writing these comments to express our concerns over your proposed new regulation on the installation of non-catalytic wood stoves certified to the EPA NSPS 2020. Ref Section 7.07 Control Strategies; page III.D.7.7-20.

Your proposed regulation is asking for additional real time emissions data that cannot be determined using the EPA test procedure. Presumably, the intent is to view the startup emissions and arbitrarily exclude wood stoves that have a certain emission profile at startup although this is not defined in the proposed regulation.

It is well known that emissions are higher at startup; as anyone who has observed a stove, fireplace, campfire.... starting, understands. The EPA approach of looking at the average emissions rate (grams/hour) over the entire test run with a very low passing grade (maximum of 2 gr/hour with crib wood or 2.5 gr/hour with cordwood) already eliminates every stove with high emissions at startup.

The EPA dilution tunnel procedure is well proven and understood for testing wood stoves and we believe it is wise to keep that procedure, particularly while the industry is transitioning from crib to cordwood testing. As you know the ASTM cordwood test protocol was developed as a consensus standard which required years of cooperation between the EPA and all stakeholders, including state representatives. We believe that many technical issues have been resolved during the years it took to develop it, making the ASTM cordwood standard the preferred test protocol for now.

We are open to any alternative cordwood testing procedure (NESCAUM IDC or others), but we think the TEOM approach (and its possible capacity to look at emission profiles) has a long way to go before it can be considered that. Also, it will be very confusing for everyone right now to use two emissions standards simultaneously.

Personally, I don't know the TEOM technology and I think almost nobody in our industry (including the EPA recognized ISO 17025 certification agencies) know much about TEOM. What are the limitations, the precision, the cost of operation, the repeatability, etc. when testing wood stoves? Add to that a lack of qualified independent labs/technicians to conduct testing, no confirmation/audit testing procedure and no opportunity as this point for competitive bidding to control testing costs.

The data set presented in the SIP is very limited and we don't really know if it is representative of non-catalytic and hybrid / catalytic stoves. It lacks scientific rigor and for that reason alone we think your proposed regulation needs to be modified to remove reference to the TEOM approach.

Regards,

A handwritten signature in blue ink that reads "André Bibaud". The signature is fluid and cursive, with the first name "André" and last name "Bibaud" clearly legible.

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