

From: [Heil, Cynthia L \(DEC\)](#)
To: [Smith, Rebecca J \(DEC\)](#)
Subject: attachment to comment - Neufeld (Blaze King)
Date: Monday, July 29, 2019 8:42:36 AM
Attachments: [ADEC Comments for TEOM.pdf](#)

B) Comment:	Blaze King Industries, Inc. comments on SIP requirement for TEOM testing on non catalytic wood heaters.		
B) Fiscal Impacts:	False		
B) Submission Detail:	07/16/2019 09:27 AM	http://dec.alaska.gov/Applications/Air/airtoolsweb/Home/ViewAttachment/16855968/dHDzTgMivQW3jH3qRQjEw2	Chris Neufeld cneufeld@blazeking.com



July 15, 2019

Cindy Heil
Program Manager
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501-2617

Cindy,

Thank you for the opportunity to comment on Amendments to State Air Quality Control Plan Vol. III as it pertains to the proposed Air Plan (SIP) for non-attainment area in Fairbanks North Star Borough. There is no question the State of Alaska Department of Environmental Conservation has a significant challenge in trying to reach attainment in the FNSB.

Blaze King Industries, Inc., would like to address a specific area of concern and seeks clarification to a proposed item, page III.D.7.7-20, the requirement for non-catalytic wood-fired devices to be subjected to additional testing using a TEOM.

Unless we missed it, the SIP does not specifically state what the purpose or intent is for the additional TEOM testing for non-catalytic wood stoves. This lack of clarity results in a great deal of uncertainty. We are concerned about the lack of experience in the industry and EPA certified test labs using a tapered element oscillating microbalance, originally designed for testing ambient air for particulates. To the best of our knowledge, there is a single individual with experience in the use of a modified TEOM for wood stove emissions testing. Clearly, having only a single expert would create a significant burden on the individual as well as manufacturers if such additional emissions testing were necessary.

Additional costs would be incurred by manufacturers to have their non-catalytic wood heaters shipped and tested with a TEOM. This would most certainly raise the cost to the consumer for non-catalytic wood heaters. To the best of our knowledge, there is not a vetted test method to be used in concert with TEOM testing. Is it possible ADEC has already addressed the matter of EPA certified lab familiarity with TEOM testing and that was not clarified in the SIP? We are also concerned as to why and how any additional data that is collected might be used. Within the SIP, there was no specific rationale addressed for the gathering of the additional testing with a TEOM.

It is our opinion that only fully vetted, and EPA approved test methods should be used to regulate wood heaters. Blaze King has to date elected to not test with any alternative test methods for this specific reason.

Regards,

Chris Neufeld
Vice President

Blaze King Industries Inc.

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