

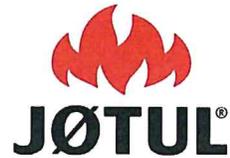
From: [Roger Purinton](#)
To: [Dec Air Comment](#)
Subject: Jotul North America comments on ADEC Air Quality Control Plan
Date: Wednesday, July 24, 2019 6:19:57 AM
Attachments: [Jotul comments on ADEC Air Quality Control Plan.pdf](#)

To whom it may concern,

Attached please find comments from Jøtul North America regarding the draft ADEC Air Quality Control Plan as provided by Public Notice on May 10, 2019.

Sincerely,

Roger W. Purinton
Research & Development Manager
Jøtul North America



July 23, 2019

Ms. Cindy Heil.
Division of Air Quality
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, Alaska 99501

Subject: Alaska State Air Quality Control Plan

Dear Ms. Heil,

The purpose of this correspondence is to provide comment as an interested stakeholder regarding a proposal included in the State Air Quality Plan Vol. II: III.D.77 Public Draft Notice of May 10, 2019.

Jøtul North America, located in Gorham (Portland), Maine is a manufacturer of high quality wood and gas fired space heaters. Jøtul North America (JNA) also maintains a state of the art Research & Development department that includes a qualified product certification testing laboratory at the same location.

In reviewing the proposed air quality plan, JNA took particular notice of Section 7.7.5.1.2 "Device Requirements – wood-fired & coal-fired standards". JNA has very significant concerns regarding the proposal of requiring testing conducted utilizing the TEOM device to qualify wood heaters. The following is a summary of those concerns regarding the TEOM as a testing device for measuring wood heater emissions.

- JNA is unaware of any data from the manufacturer or designer of the TEOM that supports the device as being suitable for monitoring wood heater emissions.
- As it stands now, the amount of and type of data submitted by Northeast States for Coordinated Air Use (NESCAUM) in support of the TEOM is limited and of a very small sample lot that should be considered insufficient data to support a conclusion that the TEOM is a qualified and acceptable device for the intended application.
- JNA is unaware of any sanctioned and organized inter-laboratory (round robin) evaluations having been conducted to thoroughly evaluate the performance of the TEOM device as applied in the proposal. Well designed and executed inter-laboratory comparisons are critical in determining the levels of uncertainty, repeatability and reproducibility of any test method and or testing apparatus prior to acceptance and implementation.

- The proposal only references federal EPA emissions limits in g/hr. The proposal does not address any real time or momentary emissions results obtained from the TEOM, such as acceptable limits.
- The proposal does not reference any codified or recognized test method for appliance operation when tested with the TEOM.

JNA provides these comments for informative purposes and in good faith. Without more significant and thorough investigation of the TEOM as a fully vetted and reliable wood heater emissions determination device, adoption of such usage certainly invites the potential of unintended consequences to all stake holders .

Respectfully submitted,



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