

Addressing Deficiencies Through Retesting

The Alaska Department of Environmental Conservation (DEC) is providing the following options for returning a residential wood heating device to the Alaska Approved Device List for those devices currently on the No Determination List due to test report deficiencies. DEC recognizes that since the initial certification test report review, a number of issues have arisen that resulted in the removal of devices from the Alaska Approved Device List that may have been beyond the control of the device manufacturer but that cannot be rectified without a retest of the device. The following options have been identified that, upon completion and approval, may allow a device back on the Alaska Device List, possibly, without further action from EPA.

However, if a retest has been requested by EPA's OECA, please contact DEC. DEC will work with EPA on the appropriate process moving forward in those instances.

Option 1: Retest using Method 28

Eligibility:

1. Devices that already have an EPA certification

Requirements:

1. Manufacturer shall provide 30 days' notice to ADEC, notice to include:
 - a. Manufacturer make and model,
 - b. Reference to EPA certification,
 - c. Test laboratory to be used,
 - d. Testing protocol including methods to be used and manufacturer's instructions to the laboratory
 - e. Testing date
2. Retest must be done at an EPA certified lab
 - a. Must be recorded
 - b. Must be available for DEC to witness remotely
3. Test results must be submitted on a DEC provided form within 60 days of test completion.
4. Test must be conducted in accordance with the NSPS and test method, ensuring that there are no deficiency items as identified in the "US EPA Wood Fired Appliance Test Report Deficiency Items" document. DEC is developing clarifications on when it is acceptable to stop a test run and when it is unacceptable. Furthermore, DEC will clarify what is a valid test run and what is an invalid test run when applying the 1-hr filter pull Alaska standards. These clarifications will be added to this document at a later date.
5. Test report may be submitted directly to DEC for review (please exclude any CBI information – see list) and the test report must demonstrate the device meets Alaska's emission standards in 18 AAC 50.077:
 - a. 2.0 g/hr average emission rate
 - b. 6.0 g/hr 1-hr filter pull or 4.0 g/hr rolling one hour average with TEOM
 - c. Meet test review requirements (#4 above)

Results:

1. Upon completion of review, if all items met, full approval and placement on Ak Approved Device List.
2. Upon expiration of the original EPA certification, device will be removed from approved list unless the device has been re-tested and recertified by EPA, and the recertification test review meets all requirements. Recertification waivers issued by EPA, for devices whose original certification test was conducted prior to April 16, 2021, will only be accepted on a case-by-case basis. Re-tests are expected for most devices given the poor results from the certification test report review.

Option 2: Retest using Alt-140/IDC

Eligibility:

1. Devices that already have an EPA certification

Requirements:

1. Manufacturer shall provide 30 days' notice to ADEC, notice to include:
 - a. Manufacturer make and model,
 - b. Reference to EPA certification,
 - c. Test laboratory to be used,
 - d. Testing protocol including methods to be used and manufacturer's instructions to the laboratory
 - e. Testing date
2. Retest must be done at an EPA certified lab
 - a. Must be recorded
 - b. Must be available for DEC to witness remotely
3. Test results must be submitted on a DEC provided form
4. Test must be conducted in accordance with the NSPS and test method, ensuring that there are no deficiency items as identified in the "US EPA Wood Fired Appliance Test Report Deficiency Items" document. DEC has also included clarification on when it is acceptable to stop a test run and when it is unacceptable. Furthermore, DEC will clarify what is a valid test run and what is an invalid test run when applying the 1-hr filter pull Alaska standards. These clarifications will be added to this document at a later date.
5. Test report may be submitted directly to DEC for review (please exclude any CBI information – see list) and the test report must demonstrate the device meets Alaska's emission standards in 18 AAC 50.077:
 - a. 2.0 g/hr average emission rate
 - b. 6.0 g/hr 1-hr filter pull or 4.0 g/hr rolling one hour average with TEOM
 - c. Meet test review requirements (#4 above)

Results:

1. Upon completion of review, if all items met, full approval and placement on Ak Approved Device List

2. Upon expiration of the original EPA certification, device will be removed from approved list unless the device has been re-certified by EPA, and the recertification test review meets all requirements. Recertification waivers issued by EPA, for devices whose original certification test was conducted prior to April 16, 2021, will only be accepted on a case-by-case basis. Re-tests are expected for most devices given the poor results from the certification test report review.

Option 3: Retest options for pellet devices (coming soon)

DEC is currently working on additional options and will post those as they become available.