



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

FEB 28 2018

Mr. Justin White
Hearthstone QHPP, Inc.
#17 Stafford Ave.
Morrisville, VT 05661

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Dear Mr. White,

I am writing in response to your letter dated January 12, 2018, regarding wood heaters manufactured by Hearthstone QHPP, Inc. (Hearthstone). This response, dated February 28, 2018, supercedes our previous response (dated February 26, 2018) to correct an inaccuracy regarding required changes to ASTM E3053-17.

You are requesting to use an alternative test method, using cord wood, as referenced in section 60.532(c) of 40 CFR part 60, Subpart AAA, Standards of Performance for New Residential Wood Heaters (Subpart AAA) to meet the 2020 cord wood alternative compliance option. The 2020 cord wood alternative compliance option states that each affected wood heater manufactured or sold at retail for use in the United States on or after May 15, 2020, must not discharge into the atmosphere any gases that contain particulate matter in excess of 2.5 g/hr. Compliance must be determined by a cord wood test method approved by the Administrator along with the procedures in 40 CFR 60.534. You have requested approval to use the procedures and specifications found in ASTM Method E3053-17, a cord wood test method titled, "Standard Test Method for Determining Particulate Matter Emissions from Wood Heaters using Cordwood Test Fuel," in conjunction with ASTM E2515-11 and Canadian Standards Administration (CSA) Method CSA-B415.1-10, which are specified in 40 CFR 60.534.

We understand that Hearthstone is also requesting that the alternative method proposed above be approved to apply broadly to all wood heaters manufactured by Hearthstone meeting the requirements of Subpart AAA, from the approval date of this request until such time that Subpart AAA is revised or replaced to require a different cord wood certification method, providing all requirements of section 60.533 of Subpart AAA are met.

With the caveats set forth below, we approve your alternative test method request for certifying wood heaters using ASTM E3053-17 in conjunction with section 60.534 of Subpart AAA to meet the 2020 cord wood compliance option until such time that Subpart AAA is revised or replaced to require a different cord wood certification method. We also approve application of this alternative method to all wood heaters manufactured by Hearthstone meeting the requirements of Subpart AAA.

As required in Subpart AAA, section 60.354(d), you or your approved test laboratory must also measure the first hour of particulate matter emissions for each test run using a separate filter in one of the two parallel sampling trains. These results must be reported separately and also included in the total particulate matter emissions per run. Also, as required by Subpart AAA, section 60.534(e), you must have your approved laboratory measure the efficiency, heat output, and carbon monoxide emissions of the tested wood heater using CSA-B415.1-10. For measurement of particulate matter emission concentrations, ASTM 2515-11 must be used.

The following change to ASTM E3053-17 must be followed:

1. Coal bed conditions prior to loading test fuel. The coal bed shall be a level plane without valleys or ridges for all test runs in the high, low, and medium burn rate categories.

The following changes to ASTM E2515-11 must be followed:

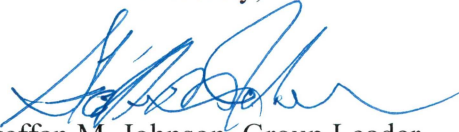
1. The filter temperature must be maintained between 80 and 90 degrees F during testing.
2. Filters must be weighed in pairs to reduce weighing error propagation; see ASTM 2515-11, Section 10.2.1 Analytical Procedure.
3. Sample filters must be Pall TX-40 or equivalent Teflon-coated glass fiber, and of 47 mm, 90 mm, 100 mm, or 110 mm in diameter.
4. Only one point is allowed outside the +/- 10 percent proportionality range per test run.

A copy of this letter must be included in each certification test report where this alternative test method is utilized.

It is reasonable that this alternative test method approval be broadly applicable to all wood heaters subject to the requirements of 40 CFR part 60, Subpart AAA. For this reason, we will post this letter as ALT-125 on our website at <http://www3.epa.gov/ttn/emc/approalt.html> for use by other interested parties. As noted earlier in this letter, this alternative method approval is valid until such time that Subpart AAA is revised or replaced to require a different cord wood certification method, and at such time, this alternative will be reconsidered and possibly withdrawn.

If you have additional questions regarding this approval, please contact Michael Toney of my staff at 919-541-5247 or toney.mike@epa.gov.

Sincerely,



Steffan M. Johnson, Group Leader
Measurement Technology Group

cc: Amanda Aldridge, EPA/OAQPS/OID
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