

Wood Stove Talking Points

Changeouts:

Let's address the allegation that stove changeouts do not work. This is just not true. Puget Sound in Washington state has done a great job with their program. And it has been successful because industry and air quality folks like Amy Warren worked very closely with one another. Puget Sound regulators have a strict and well-enforced program of identifying violators of their program. Industry has supported the need to identify those individuals that choose to not operate their EPA clean burning wood stoves properly and hold them accountable.

You won't convince the folks in Libby Montana that the air quality hasn't improved. Walk down the streets of Libby and speak to the folks that live there and they will tell you how much better their quality of life has been since the sweeping stove changeout program where regulators and industry worked in a collaborative effort to address the air quality. Hundreds of old wood heaters have been installed by experts and consumers educated on proper operation.

So why hasn't the stove changeout program in Fairbanks North Star Borough been as successful as other documented communities? Let's begin by stating they ran the program without consulting the experts, industry experts. Millions of dollars were spent by allowing residents with old wood stoves to simply drive up to a retailer of their choice and load a new, ultra clean burning stove in the back of a pickup truck and drive away. Every informed individual knows the role that chimneys play in a stove's ability to perform as intended; that is to provide ultra clean burning performance. Yet in Fairbanks, the Borough, in conversations with industry experts, were shocked to learn the role chimneys play in a stoves performance. One of the regulators said to an industry expert "You mean the chimney can affect emissions?". Millions of dollars have been spent over nearly a decade and only recently has the requirement that a qualified individual installer must install the stove.

Test Methods

In the early 1980's the state of Oregon recognized they had air quality issues. State officials, Test Lab Engineers, Industry, and others worked tirelessly to develop a program to evaluate wood stove performance. Their goal was first to develop a test method that reduced the amount of variability in the method. In doing so, regulators and consumers alike would have a more apples to apples comparison of wood stoves. This test method, using Douglas Fir dimensional lumber, often called the "crib fuel test method" was titled Oregon Method 7 or OM7.

In 1988, the EPA adopted OM7 and with some slight upgrades to the method and titled it Method 28 or M28. For wood stove heaters, M28 became the Federal Reference Method (FRM) of choice. Let's not pass over the importance of this being an FRM. Prior to EPA launching M28, the process included hundreds of experts, each being able to contribute to the process and express concerns about the proposed Method. Once EPA had the proposed method somewhat finalized, it was opened to public comment. This process is sound because it does not exclude any citizen from filing additional comments. After consideration of all comments, the Method was published and in doing so, consumers were able to compare stove performance and choose the best one for their application. What M28 does not do and never purported to do, is provide real world emissions.

You see, to provide regulators with real world emissions, you'd have to install and operate the stoves like a consumer would. Consumers in Vermont burn a different species of firewood than those in New Mexico or Oregon or California or Fairbanks. Wood stoves are tested on dilution tunnels and not the chimneys you find in real world applications. Yet state regulators each want to know how stoves perform on the species of wood most burned in their state. The easily identified problem is there is no "vanilla" species of wood that can be found coast to coast. And transporting firewood across state lines can be illegal. Some regulators feel maple is the correct "vanilla" fuels species to use in testing wood stoves, which fails to recognize the significant difference between various subspecies of maple, which can be extensive. So much for the original goal of eliminating variability in the test method.

Between 2010 and 2015, industry, EPA, state regulators and test labs worked on a test method that would help provide regulators the answer to that question. Hundreds of meetings, both in-person and virtual, were held and stoves were burned to collect data for what would eventually become ASTM3053. The brilliance of the ASTM process is that in addition to it being a collaborative effort, it can also be updated to address any identified shortcomings. Manufacturers now had two options to test wood heaters, the FRM Method, M28 and now ASTM3053, a method of testing using cordwood.

Industry and others involved in the development of ASTM3053 acknowledged the method would increase variability as compared to the Federal Reference Method, M28. Those that were involved included regulators from states such as Oregon, Washington, Montana, and many others including the State of Alaska. Industry agrees that the ASTM Method needed changes based upon factors identified once manufacturers began using the method. That is the brilliance of the ASTM process, making changes to correct shortcomings in the test method can be done in a very timely manner.

Unfortunately, EPA tossed aside ASTM3053 after state regulators identified shortcomings in the method rather than just making the revisions that were necessary. It should not be forgotten that industry volunteered to spend millions of dollars testing using the ASTM method and in exchange provided EPA with emission data that would advance future test methods. EPA is currently in the process of developing a new FRM for testing wood stoves with cordwood and it should be available to manufacturers to use by the next few years.

Facts:

Industry supports regulation. Industry has responded each time new regulations are imposed by developing cleaner and more efficient wood stoves. And more efficient wood stoves burn less wood. Industry has invested millions of dollars in the development and use of a cordwood test method. Industry has the same goal as regulators, cleaner air. And when provided with sufficient time to develop products that reach ever evolving regulations they have responded.

From the filing by the states suing EPA, "If newer wood heaters do not meet cleaner **standards**, then programs to change out old wood heaters may provide little health benefits at significant public cost."

It is illegal to sell wood stoves that do not meet the **standards** set forth by EPA in the 2015 New Source Performance Standards. Standards are required "passing grades" that must be achieved to be legal to sell in all 50 states.

Also, from the filing by the states suing EPA, The states allege that the EPA's current standards must be reviewed and that its testing and certification program is so ineffective, it has failed to ensure the existing standards." In fact, many of the states named in the filing participated in the development of the ASTM3053 cordwood test method.

Industry supports fuel choice for sound reasons. Heat pumps are a great way to help consumers efficiently and cleanly heat their homes, but they only work down to around 30 degrees Fahrenheit. And as we all know, it can get a great deal colder here in the Northeast. Families need your help in staying warm and safe in their homes by being able to purchase and have today's clean burning EPA wood stoves in their homes. We ask that you continue to support fuel choice legislation, the voters need your support.