Message

From: Sanchez, Rafael [Sanchez.Rafael@epa.gov]
Sent: 2/28/2020 10:22:57 PM
To: John Ackerly [jackerly@forgreenheat.org]
CC: Aldridge, Amanda [Aldridge.Amanda@epa.gov]; Scinta, Robert [scinta.robert@epa.gov]; Yellin, Patrick [Yellin.Patrick@epa.gov]
Subject: RE: is it OK to advertise using stove with door open?

Hi John,

This a follow up to your February 21, 2020, email regarding the Jøtul F 400 Castine CF and whether the Wood Heaters Rule allows the advertisement of a stove with the door open. As I explained in my earlier email, an EPA certified heater must be sold as tested by the EPA approved test lab. Upon discussing the matter with Jotul, they acknowledged the requirements in the rule and told me that the company no longer offers for sale viewing screens. Furthermore, they said to me that the website advertisement is outdated. I requested that Jotul remove all references to viewing screens or/and using the heater with the door open. Jotul committed to complete the revision by March 13, 2020.

Again, we thank you for your commitment to ensuring that retailers and manufacturers comply with the Wood Heater regulation.

Rafael Sanchez, Ph.D.
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Teleworking on Mondays and Fridays.
You can reach me at 571-732-2018

The Excel MS EPA Certified Wood Heater List has been retired. The Agency has now developed a new fully searchable EPA Certified Wood Heater Database **or** https://www.epa.gov/compliance/epa-certified-wood-heater-database. **Please try it and let us know!**

From: John Ackerly <jackerly@forgreenheat.org>
Sent: Sunday, February 23, 2020 8:02 PM
To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Cc: Aldridge, Amanda <Aldridge.Amanda@epa.gov>; Scinta, Robert <scinta.robert@epa.gov>; Yellin, Patrick <Yellin.Patrick@epa.gov>
Subject: Re: is it OK to advertise using stove with door open?

Thanks Rafael.

John

On Fri, Feb 21, 2020 at 12:49 PM Sanchez, Rafael <Sanchez.Rafael@epa.gov> wrote:

Hi John

In the US, a heater must be tested the same way as intended and used by the customer. As Amanda alluded to, some manufacturers promote their heaters with an optional viewing screen. This screen is designed to be used with the heater's door open. Manufacturers are promoting this optional use in places where there aren't environmental restrictions, such as some providences in Canada. Recently, a manufacturer requested EPA to review the use of language to that effect in their manuals. The proposed language is something like ...this product cannot be used with the door open where strict regulations are impletemted.

I called Jotul and left a message to inquire about the heater you have mentioned. I'll keep you posted.

Rafael Sanchez

From: John Ackerly <jackerly@forgreenheat.org>
Sent: Friday, February 21, 2020 11:31 AM
To: Aldridge, Amanda <Aldridge.Amanda@epa.gov>
Cc: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Subject: Re: is it OK to advertise using stove with door open?

Thanks Amanda, but I thought surely there is something in the NSPS that prevents a device from being used in radically different ways than it was tested. Technically, the NSPS even says you can't burn wet wood in stoves, doesn't it? If you can advertise using the stove in ways it wasn't tested, then can you advertise that you don't really need to have a catalyst in a catalytic stove? Or that its OK to alter the air supply, or any number of other ways that consumers are known to use and alter their stoves?

John

On Fri, Feb 21, 2020 at 11:09 AM Aldridge, Amanda <Aldridge.Amanda@epa.gov> wrote:

I think you are referring to this language: POPULAR OPTIONS INCLUDE: SCREEN FOR OPEN DOOR FIRE VIEWING,

We just recently discussed this topic and acknowledged that some models are sold in areas that do not have regulations that require testing with the door open and closed to be able to allow this. We discussed that perhaps a statement in the owner's manual should state where and how this is allowed.

I will let Rafael follow up, as I do not know if management has approved the wording of this final statement

From: John Ackerly <jackerly@forgreenheat.org>
Sent: Friday, February 21, 2020 10:16 AM
To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>; Aldridge, Amanda <Aldridge.Amanda@epa.gov>
Subject: Re: is it OK to advertise using stove with door open?

Just wanted to make sure you got this email. Amanda - do you have an opinion on this?

John

On Wed, Feb 12, 2020 at 4:57 PM John Ackerly <jackerly@forgreenheat.org> wrote:

> Dear Rafael and Amanda,
>
> I may have raised this question years ago, but I'm curious if its allowed to advertise that the stove can be used with the door open. Seems like that would be a real violation, unless the stove is also tested that way and can meet emission standards. Here is how Jotul advertises a number of their stoves. Screen shot attached.
>
> "OPTIONS INCLUDE: SCREEN FOR OPEN DOOR FIRE VIEWING"
>
> John
>
> --
>
> Alliance for Green Heat
> 6909 Laurel Ave, #5461

Takoma Park, MD 20912
301-204-9562

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