Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 10/30/2018 8:43:37 PM
To: Johnson, Steffan [johnson.steffan@epa.gov]
Subject: RE: FYI

I am sure you already have read these items. Sorry to pester.

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Tuesday, October 30, 2018 4:29 PM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: FYI

That is very informative. Thank you.

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Tuesday, October 30, 2018 4:23 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: FYI

You are correct. There is little random or variable in the ASTM method, however, HPBA's comments on the rule and in presentations seem to reflect that ASTM is representative of in-use operations, which they state are random and variable. A few nuggets from their comments below.

"HPBA supports a move toward more "real world" relevant certification testing that would per force include testing with cordwood. In this regard, HPBA is strongly supporting a broad stakeholder effort to develop such a test method under ASTM auspices, which is well underway. "
"Thus, for the reasons discussed below, EPA must revisit and withdraw its proposed Step 2 and 3 limits, and in their place adopt a scheme under the statute's "innovative technology waiver" provision that will build a needed bridge to a new paradigm—standards based on testing with cordwood under conditions reasonably representative of likely consumer use patterns."
"In the laboratory tests considerable attention is paid to start-up conditions at the fuel loading stage including size and character of an established coal bed and timing of setting air controls and closing the firebox door. These conditions are highly unlikely to be regularly or predictably reproduced by consumers in the field, but can make a substantial difference in emissions performance in the laboratory."
"All stakeholders – industry, states, and EPA – have agreed on the need to move toward more real-world representative test methods for certifying woodstoves that are based on burning cordwood and not dimensional lumber cribs. A broadly based ASTM work group is engaged in an expedited effort to develop a more representative cordwood test method for woodstoves as these comments are being written, and this effort hopefully will be completed and accepted as an ASTM method before the revised regulations are finalized. HPBA supports a transition from crib-based standards to cordwood-based standards because the latter are more representative of real world usage. The objective is to develop a test method that is more representative of consumer use patterns, starting with the fuel (cordwood). All test methods, however, inevitably involve compromises driven by costs and other technical and practical considerations. In the end, it is hoped that broad central tendencies of consumer behavior will be captured, but it is unrealistic to expect that all aspects of consumer behavior can be reflected."

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Tuesday, October 30, 2018 4:00 PM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: FYI

Where is the requirement for "random and variable"? Not that there shouldn't be one....I just don't see it in the DRAFT ASTM workgroup methodology.

Instead, what I see is a whole bunch of "place kindling and fuel pieces according to manufacturer's instructions".

Stef

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Tuesday, October 30, 2018 3:48 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: FYI

Yes, I was wondering if this meets an EPA definition of random and variable? Also thought it might be of interest in examining how different protocols and how they are implemented.

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Tuesday, October 30, 2018 3:40 PM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: FYI

Ahh. You are referring to the random fuel loading procedures?

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Tuesday, October 30, 2018 3:35 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: FYI

Oops I was using my adobe page numbers I meant 160-162 – specifying spacing, stove operation, coal bed weights, number of pieces and piece placement, which vary from burn to burn.

From: Johnson, Steffan <johnson.steffan@epa.gov>
Sent: Tuesday, October 30, 2018 3:33 PM
To: Lisa Rector <lrector@nescaum.org>
Subject: RE: FYI

Are you referring to the blank page on 153?

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Tuesday, October 30, 2018 2:50 PM
To: Johnson, Steffan <johnson.steffan@epa.gov>
Subject: FYI

So if you are looking for some reading materials, check out page 152-154 https://sbiweb.blob.core.windows.net/media/4563/blackcombii-17-series.pdf Let me know your thoughts, if you want to share.

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