

2/15/11 DRAFT

Draft Options Being Considered for Revision of Residential Wood Heaters NSPS

Note: These options are being analyzed further and thus are subject to change as EPA prepares a proposal for publication in the Federal Register in summer 2011 for public comment. After EPA considers public comments on all aspects of the proposal and makes appropriate changes, the final rule will be issued in 2012. Point of Contact: Gil Wood

APPLIANCE TYPE	DRAFT OPTION	DRAFT COMPLIANCE DATES	KEY ISSUES/ OTHER CONSIDERATIONS
Wood stoves	Tighten existing NSPS limits to match WA limits, i.e., 4.5 g/hr (non-catalytic), 2.5 g/hr (catalytic)	2013	Current NSPS limits are 7.5 g/hr (non-catalytic stoves) and 4.1 g/hr (catalytic stoves), however >85% of existing EPA-certified stoves currently meet WA limits, i.e., 4.5 g/hr (non-catalytic) and 2.5 g/hr (catalytic) Another option would be to tighten the level further in 2015 by establishing one limit for both non-catalytic and catalytic stoves, i.e., 2.5 g/hr
Hydronic heaters	Include in NSPS 0.32 lb/mmBTU heat output; cap of 18 g/hr (matches current Phase 2 of EPA hydronic heater voluntary program and NESCAUM model rule) 0.15 lb/mmBTU heat output; cap of 7.5 g/hr	2013 (outdoor) 2014 (indoor) 2016 (outdoor + indoor)	Strong industry, states, public interest in including in revised NSPS Significant local emissions for numerous areas Proper operation and siting are very important Test method questions are in the process of being resolved
Single-burn-rate stoves	Include in NSPS Establish levels equivalent to WA limits, i.e., 4.5 g/hr (non-catalytic), 2.5 g/hr (catalytic) Request data in proposal	2014	Largest exemption for wood stoves in existing NSPS in terms of number of units sold (>40,000 units/year) In future, consider tightening to equivalent of 2.5 g/hr for both catalytic and non-catalytic
Forced-air furnaces	Include in NSPS Establish level equivalent to Canadian level, i.e., 0.93 lb/mmBTU heat output Request data in proposal	2014	Emissions more significant than previously thought In future, consider tightening to same levels as established in NSPS for hydronic heaters

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Pellet stoves	<p>Include in NSPS; i.e., do not allow exemption for >35:1 air-to-fuel ratio</p> <p>4.5 g/hr (non-catalytic), 2.5 g/hr (catalytic)</p>	2013	<p>Typically cleaner than wood stoves</p> <p>Inclusion in NSPS would reduce competitive imbalance versus wood stoves; manufacturers generally want to be included in NSPS</p> <p>Need fuel quality standards, e.g., Pellet Fuel Institute (PFI) certification</p> <p>Another option would be to tighten the level further in 2015 by establishing one limit for both non-catalytic and catalytic stoves, i.e., 2.5 g/hr</p>
Masonry heaters	<p>Include in NSPS</p> <p>2.0 g/hr daily average, 0.32 lb/mmBTU heat output</p> <p>Request data in proposal</p>	2014	<p>Strong interest by some manufacturers in being included in the NSPS</p> <p>These appliances contribute a relatively low percentage of total wood smoke emissions</p>
Manufactured fireplaces (low mass)	Do not include in NSPS at this time due to cost-effectiveness and potential economic impacts	N/A	<p>Many states want Federal regulations. Industry wants combination of EPA voluntary program and state/local rules where most needed. Request comment on whether EPA should consider developing an NSPS in the future when the housing market is expected to be recovered.</p> <p>Other options would be an NSPS at current voluntary program level of 5.1 g/kg (8 EPA-qualified models already meet this) and/or to tighten voluntary level.</p>
Masonry fireplaces	<p>Do not include in NSPS at this time due to cost-effectiveness and small percentage (10%) of total new fireplaces</p> <p>Encourage certification of masons by Mason Contractors Association of America (MCAA)</p>	N/A	

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Cook stoves	Require labeling, tighter definition Request data in proposal	2013	Less than 1000 units per year
Camp stoves	Require labeling (e.g., temporary use only)	2013	
Native American bake ovens, ceremonial fires	Continue excluding these devices from the NSPS but develop new definitions to clarify, focus exclusions	2013	
Coal stoves	Do not include in NSPS at this time due to lack of data Request data in proposal	N/A	Significant emission concerns for some local areas that have access to cheap or free coal In future, if supported by test data, consider requiring same emission levels as wood stoves
Outdoor fireplaces, chimineas, pizza ovens	Do not include in NSPS at this time due to lack of data Request data in proposal	N/A	