



July 30, 2004

Phil Johnson
NESCAUM
101 Merrimac St
10th Floor
Boston, MA 02114

Attn: Phil Johnson,

The following is a comment I have been asked to make regarding a comparison of measured outdoor furnace emissions rates and the US EPA-allowed wood-fired heater emissions rates contained in 40CFR Part 60 SubPart AAA. Section 6.532 (b)(2) of that regulation allows emission rates up to 18 grams/hour for any single test with a burn rate over 1.5 kg/hour performed in the required 4-test sequence needed for EPA certification. This EPA-allowed emissions rate limitation can be compared directly (ie, no need to normalize for methods or operating conditions) to emissions produced by a Central Boiler outdoor wood furnace.

Data from EPA an outdoor furnace testing study conducted in 1997 (EPA/600/SR-98/017) show that the average measured emissions rate for the Central Boiler outdoor furnace was 14.9 g/hour, well within EPA's allowed 18.9 g/hour single-test certified-stove.

In addition, the EPA-measured emissions factor for the Central Boiler outdoor furnace averaged 9.35 g/kg of wood burned. This emissions factor is 22.1% less than the 12 g/kg emissions factor calculated using EPA's allowed maximum emissions rate and EPA's stipulated 1.5 kg/hour burn rate.

Please call me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul Tiegs", written in a cursive style.

Paul Tiegs, PE
Senior Principal
OMNI - Test Laboratories, Inc

*EPA - 600/r-98-017 Table 4 -1a. Furnace B/B-3, Furnace B/B-4.

Patrick Bowe, CT DEP
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