

A proposal to Amend Placer County Air District Rule 225

by Jim Buckley

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The Placer County Air District Rule 225 permits EPA Phase II Certified wood stoves, pellet stoves and masonry heaters

302.2.2 No person shall sell, advertise, offer for sale, or supply, a new or used wood burning appliance unless it is one of the following:

302.2.2.1 A U.S. EPA Phase II Certified wood burning appliance,

302.2.2.2 A pellet-fueled wood burning heater,

302.2.2.3 A masonry heater, or

302.2.2.4 An appliance determined to meet the U.S. EPA particulate matter emission standard set forth in Title 40 CFR, Part 60, Subpart AAA Code of Federal Regulations, and approved in writing by the Air Pollution Control District.

The District, adhering to a literal interpretation of the Rule, seems reluctant to accept compliance under Section 302.2.2.4 by an equivalent test method. It is unclear what would be approved under Section 302.2.2.4 but apparently

not a Rumford which meets the EPA Phase II standard by an equivalency designed by the EPA to be appropriate for fireplaces. Mr. Springsteen said they had never approved any appliance under Section 302.2.2.4.

It's curious that the District permits pellet stoves and masonry heaters without testing. Our Rumford fireplaces are as clean-burning as masonry heaters as evidenced by their approval in Colorado under the rules set for masonry heaters by Regulation 4.

I also wonder if a solution to our issue of the alleged not to comply after the fact Rumford fireplace, might be to apply to the Air District Board for approval of all Rumford Fireplaces under Section 302.2.2.4. We could propose they add a new Section 302.3.1.4 to read like the masonry heater section ...

302.3.1.4 A masonry Rumford Fireplace, or

and add to the definition Section 200 paralleling the masonry heater definition ...

217 MASONRY RUMFORD FIREPLACE: Any permanently installed device that meets the definition of a Rumford fireplace in the International Residential Code (IRC) Section R1001.6

Reason:

All Rumfords are clean-burning because the straight plumb fireback and the rounded airfoil throat that allow the smoke to be hot and burning long enough to burn up the firebox where it provides useful heat and not be lost up the chimney as pollution. See <https://www.rumford.com/performance.html#rumod> and <https://www.rumford.com/images/Julianoutdoor.jpg>

Of the tests we know about ...

Our Rumfords complied with the masonry heater standard of 6 g/kg established by the State of Colorado Regulation 4. See <https://www.rumford.com/woodburningregulation/Grandletter.jpg>

In tests at OMNI, when we were allowed to build vertical fires proportional to the size of our firebox (not just the inner hearth area) as any homeowner would, our 36" Rumford emitted only 2.4 g/kg open (without doors). See <https://www.rumford.com/testRumfordresultsfull.html>

ICC Renaissance Rumfords qualify for the EPA Voluntary Fireplace with emissions of 3.0 and 3.4 g/kg. See <https://www.epa.gov/burnwise/list-qualified-fireplaces-and-fireplace-retrofit-devices>