



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Mr. Ken Morgan  
Technical Services Director  
OMNI-Test Laboratories, INC  
Post Office Box 301367  
Portland, Oregon, 97294

12/13/2023

Dear Mr. Morgan,

I am writing in response to your emails and letter dated November 20, 2023, requesting that the Environmental Protection Agency approve for use an alternative test method (ATM) for demonstrating compliance with New Source Performance Standard (NSPS) Subpart AAA, Standards of Performance for New Residential Wood Heaters (Subpart AAA). Specifically, the filter weighing procedures as outlined in ASTM E2515-11 to determine compliance for wood heaters under 40 CFR Part 60. The Office of Air Quality Planning and Standards, as the delegated authority, must make the determination on any major alternatives to test methods and procedures required under 40 CFR parts 59, 60, 61, 63, and 65. Your proposed alternative test method and our approval decisions are discussed below.

Your letter outlines concerns with the gravimetric analysis of the pair of filters used to capture particulate during each compliance test. Specifically, you state that the method suggests that weighing filters and filter assemblies in pairs will reduce measurement error, but that the method provides direction inconsistent with achieving error reduction.

As detailed in your letter ASTM E2515-11 section 9.4.4 states:

*“9.4.4 Desiccate the filters, filter gaskets, and the probe assemblies at 20 +/- 5.6°C (68 +/- 10°F) and ambient pressure for at least 24 h. Weigh each component at intervals of not less than 6 h until a constant weight is achieved. Record results to the nearest 0.1 mg. During each weighing, the period for which the components are exposed to the laboratory environment shall be less than 2 min. The filter gaskets can be weighed in sets to be used in each filter holder and kept in an identified container at all times except during sampling and weighing. The filter holder assembly after the front filter need not be desiccated or weighed.”*

As shown above, section 9.4.4 states that “...the filter gaskets may be weighed in pairs”, however it does not say that you may do so for the filter tares.

In contrast, section 10.2.1 of ASTM E2515-11 states:

*“10.2.1 Desiccate the filters and filter gaskets at 20 +/- 5.6°C (68 +/-10°F) and ambient pressure for at least 24 h. Weigh each component at intervals of at least 6 h until a constant weight is achieved. Report the results to the nearest 0.1 mg. Filters and filter gaskets may be weighed directly without a Petri dish. They may be weighed in pairs (front and back filters and front and back filter gaskets from same filter train) to reduce handling and weighing errors. During each weighing, the components shall not be exposed to the laboratory atmosphere for longer than 2 min. For the room air background sample filter and filter gasket, treat negative particulate catch weights as “zero” when determining total room air particulate weight in accordance with 10.2.”*

Additionally, you point out that section 10.2.1 allows, during post-test analysis, the filters to be weighed in pairs. You also assert that not only does this section state that filters may be weighed in pairs, but it also expresses that it is advantageous to do in order to reduce handling and weighing errors.

Furthermore, during our recent discussions of this issue, you pointed out that since ASTM E2515-11 does not specify that filters may be weighed in pairs during pre-test processing, doing so would likely lead to concerns regarding whether proper procedures were being followed. Also, in response to our inquiry of whether ASTM E2515-11 could be followed as written, where one would weigh both filters independently during pre-test processing (clause 9.4.4) and in pairs during post-test processing (section 10.2.1), you point out that this defeats the intent of section 10.2.1 in that more measurements are being performed than necessary and this goes against the stated intent of reducing handling and weighing errors.

It is your opinion, given the language in ASTM E2515-11 discussed above, that the authors originally intended that both filter gaskets and filters should be weighed in pairs during both pre-test and post-test procedures in order to reduce such errors (as evidenced by the language in section 10.2.1). Based on this, you are asking for consideration and approval of an alternative test method that would allow pre-test processing (taring) of filters in pairs as is currently allowed for filter gaskets in section 9.4.4. As you state, you seek this alternative because the errors imposed by the extra weighing of independent filters can account for a very high degree of error on today's cleaner stoves where a  $\pm 0.1$  mg of measured catch can mean  $\pm 0.2$  grams of emissions under ordinary conditions. In light of these circumstances, we agree that appropriate paired weighings must be done during both pre and post test weighings.

We have reviewed your request to perform the pre-test processing (taring) of filters in pairs as is currently allowed for filter gaskets in section 9.4.4 when conducting testing testing of wood heaters under Subpart AAA. This approval is contingent on the following conditions:

- All of the pieces of the filter and filter assemblies that are tared together during pre-test assessment must also be weighed together when the post-test gravimetric assessment is made and the results of these assessments must be recorded to the nearest 0.1 mg.

Please note that this alternative method approval is valid until such time that Subpart AAA and QQQQ are revised or replaced to require a different certification method, and at such time, this alternative will be reconsidered and possibly withdrawn. A copy of this letter must be included in each certification test report where this alternative test method is utilized.

Since this alternative test method may be of interest to others performing testing as described in ASTM2515-11 on wood heaters subject to 40 CFR 60, Subpart AAA, we believe it is reasonable to make it broadly applicable. Therefore, we will post this letter as ALT-154 on the EPA website at <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for use by other interested parties.

If you have additional questions regarding this approval, please contact Michael Toney of my staff at 919-541-5247 or [toney.mike@epa.gov](mailto:toney.mike@epa.gov).

Sincerely,

Steffan M. Johnson, Group Leader  
Measurement Technology Group

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