



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

January 6, 1999

Norbert Senf
Secretary
The Masonry Heater Association of North America
RR 5, Shawville, Quebec, JOX 2Y0

Dear Mr. Senf:

I am writing to respond to your letter of December 17, 1998 regarding masonry heaters. You indicated that MHA would like to argue against the "banning" of masonry heaters in the Bay Area.

On December 16, 1998, the Board of Directors of the Bay Area Air Quality Management District adopted a "model ordinance" that was intended to serve as guidance for Bay Area localities that have woodsmoke problems and wish to regulate new sources of woodsmoke. As you may know, the model ordinance would only permit the installation of pellet heaters and EPA-certified woodstoves. It would not permit the installation of masonry heaters. However, the model ordinance has no direct legal effect and bans nothing. Bay Area localities are free to refuse to regulate sources of woodsmoke or to modify this model as they see fit.

We are well aware that when masonry heaters and woodstoves are compared in a manner representative of home heating use, particulate emissions from masonry heaters are generally lower than those from woodstoves. This is because, as you know, masonry heaters radiate heat long after a fire is out and, when particulate emissions from the fires that generate this heat are averaged over this lengthy heating cycle, the emission rate may be lower than the emission rate for a continuously-burning woodstove. But less than 2% of Bay Area homes are heated with wood. Most woodstove and fireplace use here is aesthetic and recreational, with woodstoves and fireplaces typically being used for several hours at a time. When particulate emissions of masonry heaters are not averaged over a lengthy heating cycle, they generally do not outperform woodstoves.

The more appropriate comparison for masonry heaters is to the gas furnaces that heat 75% of Bay Area homes or the electric furnaces that heat 20% of those homes. Were masonry heaters to replace gas and electric furnaces in Bay Area homes, we would see an enormous increase in particulate pollution. We do not think that such a policy could be justified for an urban area like the Bay Area. On the other hand, in those areas of the U.S. where many homes are heated by woodstoves, we would expect to see air quality benefits from the use of masonry heaters rather than woodstoves.

There is another problem with including masonry heaters in the model ordinance. We would have to be able to ensure that only "clean" masonry heaters are allowed. This would require either an adequate particulate emissions test method

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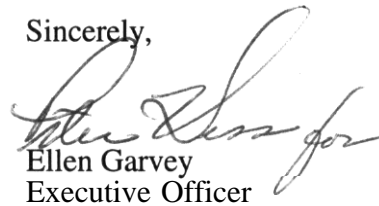
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Air Pollution Control officer

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or a very careful definition of the term "masonry heater." We reviewed the nation's only regulatory test method for fireplaces, the Washington State fireplace test method, and found it inadequate. Although your association's definition of the term "masonry heater" appears to be promising, we have no data that would assure us that all masonry heaters complying with the definition would have good particulate emissions performance.

In conclusion, we recognize the excellent performance of masonry heaters as home heaters and their usefulness in rural areas with abundant supplies of cordwood. However, we feel that it would be inappropriate for this agency to include them in the model ordinance at this time. We will continue to monitor regulatory developments in other jurisdictions and, in particular, the development of emissions test methods. Bay Area localities are, of course, free to revisit this issue if they choose to use the model in crafting a local ordinance. If you have any question, please contact Bill Guy of my staff at (415) 749-4773.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ellen Garvey".

Ellen Garvey
Executive Officer

EG:WG