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Fireplaces and Chimney Systems

June 28, 2011

Dave Walls, Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Calgreen accepted written comments

Mr. Walls,

Earthcore Industries is very appreciative for the opportunity to comment on the proposed changes to the California Green Building Standards Code (Calgreen). It is our objective to work with the states and municipalities across the country to provide Clean Burning, efficient appliances to the marketplace.

In section 4.503 of the code, woodstoves, pellet stoves and fireplaces are incorporated in the same qualification sentence as if they are qualified with the same measurements to meet the EPA Phase 2 qualification. EPA has clearly defined the different measurement requirements and we are asking that Calgreen recognize this in the verbiage as well. Woodstoves and pellet stoves are qualified by EPA using a g/hr measurement while fireplaces have been qualified by EPA using a g/kg measurement. We would ask that the two be more clearly defined in the Calgreen code. EPA has clearly set the standard for both types of wood burning appliances however the Calgreen verbiage is confusing the two as it is currently written. One of the strictest states for air quality standards, Washington State has defined wood burning devices separately, and recognizes the difference in the EPA agreements. Those fireplaces which qualify EPA Phase 2 using a g/kg measurement have been added to the approved list in Washington State. Many jurisdictions are holding fireplaces to the g/hr Phase 2 qualification for wood stoves because they are unaware of how EPA intended the fireplace qualification measurements of g/kg. If the verbiage would clearly state the following, there would be less confusion as to the EPA qualified applications:

"Woodstoves and pellet stoves are defined EPA Phase 2 qualified using 7.5 g/hr for non-catalytic and 4.1 g/hr for catalytic stoves* and fireplaces are defined as EPA Phase 2 qualified using 5.1 g/kg".

*The state of Washington requires 4.5 g/hr and 2.5 g/hr respectively.

Changing the verbiage to more clearly state the differences which EPA has already outlined and agreed to will allow those jurisdictions with wood burning capabilities the opportunity to approve fireplaces meeting the EPA Phase 2 qualification using the correct information. This would accomplish several goals; Allowing the homeowner developing in the California communities to have what they want in their home, improving the air quality in those communities while encouraging more clean burning technologies from manufacturers as a whole.

Again, we at Earthcore Industries are grateful for the opportunity to work with you in establishing cleaner, more efficient appliances to meet the standards EPA has set for California as well as other states around the country. We are conscious of our environment and will continue to explore technologies that will enhance our communities globally. Thank you for your time and consideration of the above mentioned verbiage clarification. Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Jane Koechlin

Jane Koechlin
Technical Department
Earthcore Industries