



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711**

**OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS**

December 21, 2021

MEMORANDUM

SUBJECT: Withdrawal of Broadly Approved Alternate Test Methods 125 and 127 (ALT-125 and ALT-127), use of ASTM E-3053-17 for Compliance Tests in 40 CFR 60, subpart AAA.

FROM: Richard A. Wayland, Director
Air Quality Assessment Division

TO: Regional Air Directors and Air Branch Managers

On April 28th, 2021, the Alaska Department of Environmental Conservation submitted a request to the Office of Air Quality Planning and Standards (OAQPS) requesting the withdrawal of Broadly Applicable Alternate Test Methods ALT-125 and ALT-127 used for compliance test purposes to certify wood heaters pursuant to 40 CFR 60, subpart AAA. This letter was co-signed by six other state Environmental Program Directors.

The request letter claims that the ASTM E3053-17 method allows far too much flexibility within the methodology, such that a test lab can 'explore' in its testing to find approaches for passing any appliance, regardless of design, ultimately resulting in a certification program where a manufacturer simply pays the lab to provide a passing test, rather than to measure the actual emissions from their appliance without such positioning.

On May 21st, 2021, OAQPS received a letter signed by nine State Attorneys General that requested withdrawal of Alternate Test Methods ALT-125 and ALT-127, citing support for the Alaska program and concern over a recently released NESCAUM report finding serious concerns with EPA's implementation of subpart AAA and QQQQ certification programs.

In July, August and September of 2021 Alaska submitted seven test reports to OAQPS in support of their request. After a thorough review and evaluation of the data contained in these test reports, technical staff in OAQPS recommended to management that it would be prudent for OAQPS to grant Alaska's request. After deliberations within the Agency, it was decided on December 20th, 2021, to formally withdraw ALT-125 and ALT-127, and that OAQPS will publish a Federal Register Notice as soon as practicable to formalize this action, and layout the test report data for review as well as provide steps forward for continued compliance test activities for affected parties. Therefore, we are withdrawing the broadly applicable alternate test methods, ALT-125 and ALT-127 and will post a copy of this letter on our website at: <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods>.

Of significant note is that the withdrawal of these two Alternate Test Methods does not leave this sector without compliance options. More traditional “crib wood” compliance testing using EPA Method 28R is available for all parties to use, as is ALT-140, an Integrated Duty Cycle based Alternate Test Method that uses cord wood fueling. In addition to these two options, affected parties may also request the use of a new Alternate Test Method, subject to approval by OAQPS.

Questions regarding this action may be directed to Steffan Johnson (johnson.steffan@epa.gov), Group Leader for the Measurement Technology Group in the Air Quality Assessment Division. Thank you for your attention to this matter.

Cc:

Baumgart-Getz, Adam – OAQPS OID
Boyd, Rochelle – OAQPS SPPD
Brashear, Angelina – OAQPS AQAD
French, Chuck – OAQPS SPPD
Johnson, Steffan – OAQPS AQAD
Koerber, Mike – OAQPS
Lassiter, Penny – OAQPS SPPD
Lessard, Patrick – OAQPS SPPD
Miller, Anthony – OECA
Sanchez, Rafael - OECA
Scinta, Robert – OECA
Toney, Mike – OAQPS AQAD
Tsirigotis, Peter – OAQPS
Wood, Anna – OAQPS OID