



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

December 19, 1991

MEMORANDUM

SUBJECT: Clarification of Policy for Exempt Wood Burning Devices  
in PM-10 State Implementation Plans (SIP's)

FROM: Joseph W. Paisie, Acting Chief *Joseph W. Paisie*  
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TO: Chief, Air Branch, Regions I-X

In efforts to secure approval of their PM-10 moderate area SIP's, some States appear to have adopted total bans on the installation of wood burning devices that are not certified by EPA under new source performance standards (NSPS). In so doing, some have expressed the belief that allowing the installation of any noncertified device would automatically result in having their plans rejected by EPA. This is not the case.

The critical concern to EPA remains whether the State can assure attainment and maintenance of the PM-10 national ambient air quality standards (NAAQS), consistent with applicable statutory requirements and taking into account all regulated and unregulated sources of PM-10 emissions. This concern includes the statutory obligation that PM-10 nonattainment areas demonstrate attainment as expeditiously as practicable (see section 188(c) of the amended Clean Air Act). Nothing in EPA's policies or regulations would cause the Agency to disapprove automatically a SIP revision that allows the installation of noncertified wood burning devices, so long as the State provides an adequate demonstration of attainment.

This clarification is not to suggest that Regional Offices should permit unjustified reliance on exempt devices for emission reduction credit in SIP control strategies. As indicated previously, claims for emission credit should be supported by adequate documentation of emission reduction effectiveness (see Fred H. Renner to Air Branch Chiefs, September 23, 1991, "Interpretation of EPA's Guidance for Residential Wood Combustion Emission Control Measures"). However, these devices should not be overlooked in State efforts to secure approvable SIP's simply because they were unable to receive EPA certification under NSPS regulations due to an attribute potentially unrelated to their burning efficiencies.

As you are aware, we are in the process of developing EPA's policies on the treatment of areas that cannot practicably attain the PM-10 NAAQS by the December 31, 1994 statutory deadline. Because these areas must develop and implement more aggressive strategies to achieve attainment, we may therefore have occasion to revisit the issue of exemptions as it may affect this more limited set of nonattainment areas.

If you have any questions concerning this clarification or wish to discuss a specific SIP strategy potentially affected by it, please contact Christopher Stoneman at (FTS) 629-0823.

cc: John Beale, OPAR  
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