

HEARTH INDUSTRY STATEMENT ON B-VENT -VS- DIRECT VENT

Members...our Cal Green position is stated below. We continue to work hard on this issue and will keep you abreast of new developments. Check back frequently for updates...

Hearth Industry Issues in the CALGreen Code

John Crouch, HPBA, Tuesday, September 28, 2010

Doug Hensel, Assistant Deputy Director,
CA Department of Housing and Community Development
Rob Hudler, California Energy Commission

Thank you for agreeing to meet with representatives of the Hearth Industry. As you are aware, we are concerned about possible unintended conflicts between the needs of some Air Districts in California, and the new CALGreen code. We realize that this code is part of California's typical three year code adoption cycle, and that any equivalency or interpretation, does not extend beyond this cycle.

We seek clarification on the statements below.

1. Any installed woodstove or pellet stove shall comply with U.S. EPA Phase II emission limits where applicable.

We believe this sentence seeks to reinforce local air district regulations, and make clear that older, non-EPA woodstoves cannot be included in a CALGreen house under any circumstances, which we applaud. We are concerned that the state needs to clarify that this does not ban pellet stoves that meet local air district rules. Many pellet stoves comply with EPA rules, but are not certified to those emission limits.

2. Woodstoves, pellet stoves and fireplaces shall also comply with applicable local ordinances.

We also believe that this sentence seeks to reinforce local air district regulations, and there are certainly some large areas in this state where local air districts have now banned the installation of traditional wood fireplaces, even when they include components mandated by the Energy Code such as Outside Combustion Air, and Glass Doors. There are, however, a number of smaller counties, and portions of counties, in this state with no local regulation regarding fireplaces. We believe this does not preclude the use of Energy Code compliant wood fireplaces in those areas, and we seek some clarification on this point.

Further Discussion on Gas Fireplaces

Gas fireplaces have been an important and growing trend in the new home industry since the late 1980's. When USEPA regulated wood stoves in 1988, and open wood fireplaces were banned in the Metro Denver, Colorado area, home builders have been increasingly willing to use gas fireplaces in new homes. Direct vent gas fireplaces were developed in Minnesota, especially for colder climates. Meanwhile, the "sun-belt states" have tended to focus on atmospherically vented units, also known as B-vent.

HEARTH INDUSTRY STATEMENT ON B-VENT -VS- DIRECT VENT

B-vent gas fireplaces in California has evolved from 15,000 Btu apartment style (small) fireplaces in the 70's and 80's, to two sided, see through b-vented fireplaces used as room dividers between the master bath and master bedroom. As part of this process, these fireplaces have become much more sophisticated products and now may include glass fronts, outside combustion air, and dampers. Outside air became more prevalent in the late 80's and into the 90's, especially for use in master bedrooms. In that same period of time standard 36" and 42" gas B-vented fireplaces grew in favor due to the convenience of gas and the lack of interest in burning wood. Most Southern California homeowners typically only use their fireplaces six to ten nights per year (holidays and parties), and often in very nice homes which are not well situated for firewood storage

The prevalence of gas fireplaces in new homes was pivotal in the ability of the South Coast Air Quality Management Districts recent adoption of restrictions on new woodburning fireplaces.

As requested in our earlier letter, we request a designation of equivalency for the next three year code cycle for these appliances.