tend to mis-represent our purpose and intent. This also would cast an untrue representation of the product and put us at a competitive disadvantage.

Kool-Fire IS NOT A HYBRID HEAT PUMP. Hybrid system tests are based on the assumption that at some outdoor temperature, the heat pump electrical energy usage for "heating" will stop and some other "single" source fuel will turn "on" for "heating". With Kool-Fire systems, the outdoor fan turns "off" when the fossil fuel burner turns "on", THE COMPRESSOR NEVER TURNS "OFF". Therefore, electricity PLUS another energy source are used simultaneously.

IV. UNIQUE Kool-Fire features vs.

'ordinary'' furnaces: Some of Kool-Fire's differences compared to "ordinary" fossil fuel furnaces are as follows:

a. There is no steel plate heat exchanger, Kool-Fire is an absorption heating system causing heat to the absorbed into refrigerant which has a boiling point of -40 Degree F. (Similar to a "boiler" system)

b. Kool-Fire's absorption system surface is constantly "wet", surface temperatures never exceed 55 Degree F.

c. Combustion air, both primary and secondary, on a Kool-Fire constantly changes from +50 to -40 Degree F. due to the fact that all combustion occurs OUTDOORS.

d. Some of the test data I supplied Mr. Dougherty on Kool-Fire was done by Ontario Hydro and others throughout the 80's. I NOTED that the Canadian Gas Association (CGA) test report of November 20, 1980, on an "early" version of Kool-Fire, indicates a "tested" heating output of 12.33 KW with a "combined" measured input of 10.26 KW. THIS TEST INDICATES KOOL-FIRE HAD A COMBINED EFFICIENCY OF 120%, which NO OTHER fossil fuel appliance in the world has achieved. This data does not reflect the over 20% efficiency improvement due to design changes since that time.

e. When Kool-Fire cycles "off", unlike vented furnaces, there is little heat build-up in the exchanger because the absorption coil is exposed to outdoor ambient. Kool-Fire's outdoor exchanger cools from 55 Degrees to ambient rapidly. This fact eliminates any possibility of acid formation on the outdoor exchanger.

f. Kool-Fire's design assures that a "matched" exchange rate exists between the amount of liquid refrigerant boiling and the amount of fossil fuel burning under the outdoor exchanger. This fact of it's design insures that the surface temperature of the exchanger does not exceed 55 Degree F.

Note: A limit control set at 65 Degree F., which is located "upstream" on the compressor suction line, senses return gas temperature. Two (2) 90 Degree F. limit controls are also located on the top of the outdoor exchanger coil. Any of these controls will shut the fossil fuel burner "off", then turn the outdoor fan "on", in the event of "low" refrigerant charge in the system.

To summarize:

Kool-fire burns it's fossil fuel, OUTDOORS, and is subject to extreme fluctuation of temperatures that will have to be duplicated in order to obtain accurate test results.

Kool-Fire systems function more like a 'boiler'' than like a furnace. The heat transfers medium used is refrigerant instead of water. I know of none other like it in the world

V. Concerning an HSPF rating for Kool-Fire systems

At this point, Mr. Ed Pollock, Mr. Brian Dougherty, and I all agree that Kool-Fire units cannot be tested and assigned an HSPF rating because of their unique, duel-fuel, burner-assisted design. Kool-fire DOES NOT USE any supplemental electrical resistance heat.

VI. Thoughts about Heating Season Operating Costs (HSOC):

a. Existing DOE test procedures have been developed to provide an ACCURATE evaluation and comparison of products.

b. Instead of modifying existing procedures, is the DOE at a point that NEW test procedures are required that will reflect the Comparative Annual Integrated Fuel Efficiency (CAIFE) of Kool-Fire and other "unitue/dual-fuel" systems, that could emerge in the future?

c. DOE might consider developing a test procedure that measures the actual fuel utilization of those energy sources used in the "heating" mode based on their "economic" balance point. Then factor this information in conjunction with the 'thermal" balance point of the structure.

d. Tests should consider including the TOTAL BTU OUTPUT, related costs to purchase the INPUT FUEL being consumed, and efficiencies of same. These facts could be cross-plotted on some type graph format to find the "economic" balance point of the fuels being consumed. This information could then be factored with the "bin" temperature profiles for a given geographical location. These "bin" temperatures could be the same as used by DOE in tests used for 'ordinary'' heating systems. IN CONCLUSION:

The intent of all the DOE testing is to provide an accurate, fair evaluation so that United States consumers will be provided factual information to enable them to make an informed purchasing decision. Unfortunately, times are changing and technology has advanced. I realize this stretches the imagination of those in the DOE and NIST who are responsible to be sure that this intent is fulfilled.

As previously described, Mr. Ed Pollock and I have agreed upon a course of action to resolve this matter.

We will be glad to work and supply input for this test procedure in co-operation with Mr. Pollock from DOE and Mr. Dougherty from NIST. I am sure Mr. Dave Young from Ontario Hydro will be able to provide valuable input to this process. I have contacted Mr. Hank Rutkowski, a wellknown Mechanical Engineer from the HVAC industry, who is knowledgeable of existing test procedures and is willing to lend his expertise. Mr. Gerry Vandaarvart, the inventor of Kool-fire from Canada, can offer valuable assistance to arrive at an accurate "certification" and proper "heating" mode test procedure.

I sincerely hope I have supplied enough facts to warrant a PROMPT, FÂVORABLE

RESPONSE to our "waiver" request and to motivate DOE to IMMEDIATELY grant an "interim waiver".

Respectfully,

J.N. (Jim) Friedrich, CMS,

President.

cc: Mr. Gerry Vandaarvart (Kool-Fire

- Research & Development)
- Mr. Dave Young (Ontario Hydro)
- Mr. Hank Rutkowski, Mechanical Engineer
- Mr. Brian Dougherty (NIST)
- Mr. Edward Pollock (DOE)

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ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-4720-8]

Environmental Impact Statements and Regulations; Availability of EPA Comments

Availability of EPA comments prepared January 30, 1995 through February 03, 1995 pursuant to the Environmental Review Process (ERP), under Section 309 of the Clean Air Act and Section 102(2)(c) of the National Environmental Policy Act as amended. Requests for copies of EPA comments can be directed to the Office of Federal Activities at (202) 260-5076.

An explanation of the ratings assigned to draft environmental impact statements (EISs) was published in the Federal Register dated April 10, 1994 (59 FR 16807).

Draft EISs

ERP No. D-AFS-J31024-UT Rating EO2, Blanchett Park Dam and Irrigation Reservoir, Construction and Operation, Uintah Water Conservancy District (UWCD), Special-Use-Permit and COE Section 404 Permit, Ashley National Forest, Vernal Ranger District, Uintah County, UT.

Summary

EPA supported the USFS selection of No Action as the agency preferred alternative. EPA expressed environmental objections with the build alternative due to the unmitigable impacts to over 50 acres of montane peat fen and loss of a portion of a genetically pure native salmonid population.

ERP No. D-AFS-L65235-ID Rating EO2, Boise River Wildfire Recovery Project, Implementation, North Fork Boise River and Mores Creek Drainages, Boise National Forest, Idaho City and Mountain Home Ranger Districts, Boise and Elmore Counties, ID.