

KEHILAS PUPA TZELIM INC.

346 BROADWAY BROOKLYN N.Y. 11211 718.384.4899

Solid Fuel Variance Form (24-110)

Section of Air Code Variance:

- **24-149.5 Cook Stoves (c) (existing Cook Stove)**
- "No person shall use an existing cook stove unless such cook stove is in compliance by January 1, 2020, with the requirements for control systems established by the commissioner pursuant to subdivision (b)."

1. Reason for Variance Request:

- **What is the purpose of using solid fuel (wood or coal)?**

The purpose of using a small amount of **firewood** is to fulfill a traditional religious custom of baking a special holy bread, called matzos, which were traditionally baked in wood-burning ovens. This matzah is eaten on our holy holiday of Passover. We place a small amount of wood into the gas-powered oven to uphold this traditional religious custom.

- **Explain why complying with Section 24-149.5 of the Air Code to install a pollution control device to reduce particulate matter from solid fuel cooking emissions would impose an unreasonable hardship.**

Our ovens are primarily powered by a **gas burner** 399,000 BTU/hr. The small amount of solid fuel is used only to maintain a religious custom.

- **Emissions are below the mandated threshold:** As demonstrated by the attached lab test results (EMSL Order ID: 032551141), the particulate matter (PM) emissions from our operation are **at or below** the regulatory threshold of 10 mg/m. The measured samples at 346 Broadway showed concentrations ranging from 5.2 mg/m to 10 mg/m. Therefore, the facility meets the required emission standard and the requirement to install an

emission control device is an unnecessary hardship.

2. Description of Cooking Equipment:

Oven 1 (Unit 1 of 2)

- **Application ID:** PG011425.
- **Oven Volume Capacity:** 135 Cu. Ft.
- **Operation Months:** November through the beginning of April (Passover).
- **Days per Month:** Approximately 17-20 days per month (based on a 5-day operation week).
- **Total Days per Year:** 100 days.
- **Hours per Day:** 8 hours.
- **Fuel Type:** Solid fuel used in **combination** with natural gas.
- **Solid Fuel Type:** Firewood.
- **Log Dimensions & Weight:** Approximately 4"x18", 2.5 lbs per log.
- **Logs per Day:** 32 logs.
- **Logs per Hour:** 4 logs (2 logs every half hour).

Oven 2 (Unit 2 of 2)

- **Application ID:** PG011425.
- **Oven Volume Capacity:** 135 Cu. Ft.
- **Operation Months:** November through the beginning of April (Passover).
- **Days per Month:** Approximately 17-20 days per month (based on a 5-day operation week).
- **Total Days per Year:** 100 days.
- **Hours per Day:** 8 hours.
- **Fuel Type:** Solid fuel used in **combination** with natural gas.
- **Solid Fuel Type:** Firewood.
- **Log Dimensions & Weight:** Approximately 4"x18", 2.5 lbs per log.
- **Logs per Day:** 32 logs.
- **Logs per Hour:** 4 logs (2 logs every half hour).

3. Test Data Available:

- **Do you have test data to establish the emission level without controls?**

Yes. The EMSL Analytical, Inc. Lab Test Report (Order ID: 032551141) is attached.

- If you have a pollution control device (a/k/a emission control device), what is the % reduction of particulate matter (PM)?

No.

(Section 4 is omitted as emissions are below 10 mg/m, per form instructions)

Owner Affirmation

I affirm that all submitted information is true, accurate, and complete.

Signature: _____

Date: 11/11/2025