



Vermont Department of Environmental Conservation

Air Quality and Climate Division
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(802) 828-1288

Agency of Natural Resources

October 8, 2015

Ryan Hamilton
Interphase Energy, LLC
145 Presumpscot Street
Portland, ME 04103

SUBJECT: Phase II Certification of Interphase Energy, LLC Kedel Model RTB 54 Outdoor Wood Boiler under Section 5-204 of the Vermont Air Pollution Control Regulations

Dear Mr. Hamilton:

The Vermont Air Quality & Climate Division (AQCD) has completed its review of the information Interphase Energy, LLC (IE) submitted to this office, including the November 28, 2014 test report (Project# P-1241) prepared by Services Polytests, Inc. (SPI) regarding the Kedel Model RTB 54 (manufactured by NBE Production A/S) outdoor wood boiler (OWB). The test results indicate that the RTB 54 particulate matter emissions were 0.081 lbs/million BTUs of heat output (year round weighted average), which is lower than Vermont's Phase II emission limit of 0.32 lbs/million BTUs of heat output. In addition, the test results indicate that the highest grams/hour emission rate for any individual test run was 1.4 which is lower than the 18 grams/hour maximum set by §5-204(e)(2)(ii) of the Air Pollution Control Regulations (APCR). USEPA has reviewed the SPI test report and has approved the test methods and results. The test methods used by SPI are also acceptable under APCR §5-204.

Thank you for providing this office with detailed engineering drawings and specifications for the RTB 54, as required by §5-204(e)(3)(i). We expect that all units designated as the RTB 54 will have the same specifications, within acceptable manufacturing tolerances, and that any components of these units that may affect emissions will be composed of the same materials as those in the tested unit. Please let me know immediately if this assumption is not accurate.

Based on the AQCD's and USEPA's review of the information submitted by IE and the conditions noted above concerning specifications and materials, the AQCD has determined that the IE RTB 54 OWB complies with the Phase II emission limit in §5-204(e)(2)(ii) of the APCR and that all units with the RTB 54 model designation may be distributed or sold for use in Vermont on or after the date of your receipt of this letter. This certification shall expire five (5) years after the date of its issuance, unless revoked sooner pursuant to APCR §5-204(e)(4).

I would like to take this opportunity to remind you of a related obligation that IE has under APCR §5-204(e)(5), "Notification by Manufacturers". When an OWB model is certified, this subsection requires the manufacturer to give written notification, within 30 days of receiving the certification, to its dealers and others who sell or may be selling your OWBs for use in Vermont. This notice should list all the

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OWB models being sold by IE and specifically identify the Model RTB 54 as having been approved to be distributed or sold for use in Vermont. Please provide a copy of this written notice and a list of the addressees and their locations to this office when the mailing is completed.

Thank you for IE's interest in reducing the air contaminant emissions from OWBs. If you have any questions about this letter, please contact me or John Wakefield of my staff at (802) 828-1288.

Sincerely,



Heidi Hales, Director
Air Quality & Climate Division

cc: Amanda Aldridge, USEPA, OAQPS, RTP, NC
Lisa Rector, NESCAUM