

State of Vermont
Department of Environmental Conservation
AIR POLLUTION CONTROL DIVISION
103 South Main Street, 3 South
Waterbury, VT 05671-0402

Agency of Natural Resources

Tel: 802-241-3840
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August 12, 2010

Mr. Robert Gross, Director
Piney Manufacturing Ltd.
P.O. Box 130
Piney, Manitoba, ROA 1K0.

SUBJECT: Phase II Certification of Portage and Main's "Optimizer 250" Outdoor Wood Boiler under Section 5-204 of the Vermont Air Pollution Control Regulations

Dear Mr. Gross:

The Vermont Air Pollution Control Division (APCD) has completed its review of the information Piney Manufacturing, Ltd. (Piney) submitted to this office, including the June 23, 2010 test report (No. G100135512MID-007) prepared by Intertek Testing Services NA Inc. (Intertek), regarding the model Optimizer 250 outdoor wood-fired boiler (OWB). The test results indicate that the model Optimizer 250's particulate matter emissions were 0.23 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 8.0, 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 Intertek test report and has approved the test methods and results. The test methods used by Intertek are also acceptable under APCR §5-204. Since USEPA has approved the test results and the testing was performed by an EPA accredited laboratory, the APCD is willing, for this particular test series, to waive the requirement in §5-204 regarding prior notice to the APCD of the testing.

Thank you for providing this office with detailed engineering drawings and specifications for the model Optimizer 250, as required by §5-204(e)(3)(i). This information will be kept confidential, as requested in your *Application For Confidential Treatment Of Proprietary Information* received by e-mail on August 5, 2010. We will expect that all units designated with the model number Optimizer 250 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 APCD's and USEPA's review of the information submitted by Piney on August 4, 2010, and the conditions noted above concerning specifications and materials, the APCD has determined that the model Optimizer 250 OWB complies with the Phase II emission limit in §5-204(e)(2)(ii) of the APCR and that all units with the "Optimizer 250" model designation may be distributed or sold for use in Vermont on or after the date of your receipt of this letter. This

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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 Piney 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 to its dealers and others who sell or may be selling your OWBs for use in Vermont. This notice should list all the OWB models being sold by Piney and specifically identify the model Optimizer 250 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 Piney's interest in reducing the air contaminant emissions from outdoor wood-fired boilers. If you have any questions about this letter, please contact me or Chris Jones of my staff at (802) 241-3840.

Sincerely,



Richard A. Valentinetti, Director
Air Pollution Control Division

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