



Vermont Department of Environmental Conservation

Air Pollution Control Division
103 South Main Street, 3 South
Waterbury, VT 05671-0402

Agency of Natural Resources

[phone] 802-241-3840

November 27, 2012

Mr. Abe Reimer, President
Pro-Fab Industries, Inc.
Box 112
Arborg, MB Canada ROC OAO

SUBJECT: Phase II Certification of Pro-Fab Industries, Inc "Model XT 100" Outdoor Wood Boiler under Section 5-204 of the Vermont Air Pollution Control Regulations

Dear Mr. Reimer:

The Vermont Air Pollution Control Division (APCD) has completed its review of the information Pro-Fab Industries, Inc. (Pro-Fab) submitted to this office, including the May 14, 2012 test report (No. G100079145MID-007.2R1 for model Elite 100 and XT 100) prepared and revised by Intertek Testing Services NA Inc. (Intertek), Intertek report No. 100751088MID-001 evaluating similarities between Models Elite 100 and XT100, owner's manual and engineering drawings and specifications for the model XT 100 OWB. The test results indicate that the model XT 100's particulate matter emissions were 0.24 lbs/million BTUs of heat output (year round weighted average), which is equivalent to or 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 3.8, 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 30 days prior notice to the APCD of the testing.

Thank you for providing this office with detailed engineering drawings and specifications for the model XT 100, as required by §5-204(e)(3)(i). This information was included on the disk you sent and with previous information you submitted and will be kept confidential, as requested. We will expect that all units designated with the model number XT 100 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. The APCD understands that the model XT100 is essentially the same as the Elite 100 unit tested, the difference being in the insulation and weather barriers on the XT100.

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Mr. Abe Reimer, President

Page 2 of 2

Based on the APCD's and USEPA's review of the information submitted by Pro-Fab, and the conditions noted above concerning specifications and materials, the APCD has determined that the model XT 100 OWB complies with the emission limit in APCR §5-204(e)(2)(ii) and that all units with the "XT 100" 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 Pro-Fab 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 Pro-Fab and specifically identify the model XT 100 (along with any other Vermont-certified models) 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 Pro-Fab's interest in reducing the air contaminant emissions from outdoor wood-fired boilers. If you have any questions about this letter, please contact Philip Etter of my staff at (802) 583-7120.

Sincerely,



Richard A. Valentinetti, Director
Air Pollution Control Division

cc: Amanda Aldridge, USEPA, OAQPS, RTP, NC
Lisa Rector, NESCAUM
A8 File, Pro-Fab Industries