

Vermont Department of Environmental Conservation

Air Pollution Control Division 103 South Main Street, 3 South Waterbury, VT 05671-0402 Agency of Natural Resources

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March 23, 2012

Mr. John Kehrwald, General Manager Heatmor, Inc. 105 Industrial Park Court, NE Warroad, MN 56763

SUBJECT:

Phase II Certification of Heatmor "Model 400 4S" Outdoor Wood Boiler under

Section 5-204 of the Vermont Air Pollution Control Regulations

Dear Mr. Kehrwald:

The Vermont Air Pollution Control Division (APCD) has completed its review of the information Heatmor, Inc. (Heatmor) submitted to this office, including the December 9, 2011 test report (No. 005-HH-5-3, as revised) prepared by Dirigo Laboratories, Inc. (Dirigo), and engineering drawings and specifications for the model 400 4S OWB. The test results indicate that the model 400 4S's particulate matter emissions were 0.28 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 14.0, 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 Dirigo test report and has approved the test methods and results. The test methods used by Dirigo 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 400 4S, as required by APCR §5-204(e)(3)(i). This information was included on the disks you sent and with previous information you submitted will be kept confidential, as requested. We will expect that all units designated with the model number 400 4S 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 Heatmor, and the conditions noted above concerning specifications and materials, the APCD has determined that the model 400 4S OWB complies with the emission limit in APCR §5-204(e)(2)(ii) and that all units with the "400 4S" model designation may be distributed or sold for use in Vermont on or

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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 Heatmor 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 Heatmor and specifically identify the model 400 4S (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 Heatmor'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 File A8 – Heatmor, Inc.

Richard a. Valentinette