



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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May 8, 2012

Mr. Robert Gross, President  
Piney Manufacturing Ltd.  
P.O. Box 130  
Piney, Manitoba ROA 1KO

**SUBJECT:** Phase II Certification of Portage and Main's "Optimizer 350" 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 February 7, 2012 test report (No. G100492799MID-004R1 as revised) prepared by Intertek Testing Services NA Inc. (Intertek), the owner's manual, and engineering drawings and specifications for the model Optimizer 350 outdoor wood-fired boiler (OWB). The test results indicate that the model Optimizer 350's particulate matter emissions were 0.30 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 10.5, 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 350, 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 April 30, 2012. We will expect that all units designated with the model number Optimizer 350 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 April 16, 2012 and subsequent dates, and the conditions noted above concerning specifications and materials, the APCD has determined that the model Optimizer 350 OWB complies with the Phase II emission limit in §5-204(e)(2)(ii) of the APCR and that all units with the "Optimizer

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350" 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 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 350 (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 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,



REV  
Richard A. Valentinetti, Director  
Air Pollution Control Division

cc: Amanda Aldridge, USEPA, OAQPS, RTP, NC  
Lisa Rector, NESCAUM  
File A8 - Portage and Main