



**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 20, 2011

Mr. Arthur Turple, President  
Wood Doctor  
Wood Doctor Head Office, Inc.  
499 Broadway 389  
Bangor, ME 04401

**SUBJECT:** Phase II Certification of Wood Doctor's "Model WD-HE5000" Outdoor Wood Boiler under Section 5-204 of the Vermont Air Pollution Control Regulations  
*(CORRECTED VERSION)*

Dear Mr. Turple:

The Vermont Air Pollution Control Division (APCD) has completed its review of the information Wood Doctor Head Office, Inc. (Wood Doctor) submitted to this office, including the July 21, 2010 test report (No. G100059807MID-007, revised for model HE5000) prepared by Intertek Test Laboratories, Inc. (Intertek), and engineering drawings and specifications for the model WD-HE5000 OWB. The test results indicate that the model WD-HE5000's particulate matter emissions were 0.316 lbs/million BTUs of heat output (year round weighted average), which is equivalent to 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 5.4<sup>1</sup>, 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. Note, however, that EPA and state regulators are currently reviewing EPA Test Method 28 OWHH, the method that has been used to qualify/certify residential wood boilers, due to apparent inconsistencies in some test results. Please be aware that this test method review could result in a determination that some outdoor wood boiler certification tests are not valid. In that case, the APCD may need to reassess the test results for the model WD-HE5000, which could cause the APCD to revoke this certification.

Thank you for providing this office with detailed engineering drawings and specifications for the model WD-HE5000, 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 WD-HE5000 will have the same specifications, within acceptable manufacturing tolerances, and that any

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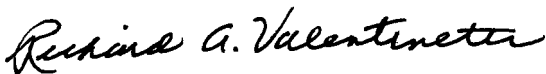
components of these units that may affect emissions will be composed of the same materials as those in the tested unit. Please let me know immediately if this assumption is not accurate.

Based on the APCD's and USEPA's review of the information submitted by Wood Doctor, and the conditions noted above concerning specifications and materials, the APCD has determined that the model WD-HE5000 OWB complies with the emission limit in APCR §5-204(e)(2)(ii) and that all units with the "WD-HE5000" 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 Wood Doctor 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 Wood Doctor and specifically identify the model WD-HE5000 (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 Wood Doctor'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

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<sup>1</sup> The value for the highest grams/hour emission rate for any individual test run was in error in the original certification letter and is corrected here. This letter supersedes the original letter of the same date, and the original certification letter is now considered void.