



Vermont Department of Environmental Conservation

Agency of Natural Resources

Air Quality and Climate Division
Davis Building, 2nd Floor
One National Life Drive
Montpelier, VT 05620-3802
(802) 828-1288

October 29, 2013

Mr. Ryan Friesen
Steel Tech Inc.
445 George Aveune
Winkler, MB R6W 4A5

SUBJECT: Phase II Certification of Steel Tech Inc.'s G100 Outdoor Wood Boiler under Section 5-204 of the Vermont Air Pollution Control Regulations

Dear Mr. Friesen:

The Vermont Air Quality & Climate Division (AQCD) has completed its review of the information Steel Tech Inc, submitted to this office, including the April 26, 2013 test report (No. G101074993MID-002.2) prepared by Intertek Testing Services NA Inc (Intertek), regarding the Model G100 outdoor wood-fired boiler (OWB). The test results indicate that the Model G100's particulate matter emissions were 0.07 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 4.3 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 AQCD is willing, for this particular test series, to waive the requirement in §5-204 regarding prior notice to the AQCD of the testing.

Thank you for providing this office with detailed engineering drawings and specifications for the Model G100, as required by §5-204(e)(3)(i). We will expect that all units designated with the model number G100 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 AQCD's and USEPA's review of the information submitted by Steel Tech, Inc. and the conditions noted above concerning specifications and materials, the AQCD has determined that the Model G100 OWB complies with the Phase II emission limit in §5-204(e)(2)(ii) of the APCR and that all units with the G100 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).

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I would like to take this opportunity to remind you of a related obligation that Steel Tech, Inc. 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, within 30 days of receiving the certification, 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 Steel Tech, Inc. and specifically identify the Model G100 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 Steel Tech, Inc.'s interest in reducing the air contaminant emissions from OWBs. If you have any questions about this letter, please contact me or John Wakefield of my staff at (802) 828-1288.

Sincerely,



Elaine O'Grady, Director
Air Pollution Control Division

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