UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
ENFORCEMENT AND COMPLIANCE
ASSURANCE

April 22, 2021

Mr. Thomas P. Morrissey
President
Woodstock Soapstone Company, Inc.
66 Airpark Road
West Lebanon, New Hampshire 03784

Re: Request for Revised Certification Test Report to Address Documentation Problems or Irregularities - Absolute Steel Hybrid 211 Catalytic Wood Heater Model; Certificate Number 33-16

Dear Mr. Morrissey:

The United States Environmental Protection Agency (EPA) has completed a post-certification review of the Woodstock Soapstone Company, Inc. (Woodstock Soapstone) certification test report, dated January 30, 2016, and submitted in order to obtain a Certificate of Compliance for the above-referenced wood heater model. As discussed below, this review found problems or irregularities in the test report documentation. EPA is requesting that you address these problems or irregularities by revising the test report to include all required information pertaining to a valid certification test. If a revised test report is not submitted as requested and within the time allotted, EPA may at its discretion determine that the certification test was not valid, which would serve as the basis for revoking the Certificate of Compliance in accordance with the 2015 Wood Heater Rule at 40 C.F.R. § 60.533(l).

The 2015 Wood Heater Rule authorizes EPA to issue a Wood Heater Certificate of Compliance upon a manufacturer submitting all required documentation pertaining to a valid certification test. Such documentation must include a complete test report providing information for all test runs, including raw data sheets, laboratory technician notes, calculations, and test results. In addition, the documentation must include the items specified in the applicable test methods. *See* 40 C.F.R. § 60.533(b)(5). EPA issued a Certificate of Compliance to Woodstock Soapstone dated March 22, 2016. Upon subsequent review of the certification test report, however, EPA determined that certain required test report information was missing and/or require clarification. Therefore, EPA requests that Woodstock Soapstone revise the test report to include the following additional information to maintain the compliance certification for the above-referenced model.

Test Report Problems or Irregularities	**Regulatory Citation**	**Information Needed to Address Problems or Irregularities**
Missing Documentation - Run Validity and Anomalies.	40 C.F.R. § 60.533(b)(5)	Include in the revised test report (test results section) a discussion of each run's validity and anomalies, if any.

Test Report Problems or Irregularities	Regulatory Citation	Information Needed to Address Problems or Irregularities
Missing Information in the Non-Confidential Business Information (Non-CBI) Test Report.- Firebox Volume Calculation Data.	40 C.F.R. § 60.533(b)(5), 40 C.F.R. § 60.537(f), and ASTM E2780 (9.3)	Include in the revised test report firebox volume calculation data.
Missing Test Run Data in Non-CBI - Preliminary Test Runs.	40 C.F.R. § 60.534(a)(1)	The test report indicates that preliminary test runs were conducted (page 60). Include in the revised test report any preliminary test run data and associated particulate matter emissions data.
Compliance Determination Cannot be Made - Conditioning Data.	M 28R (2.1.4), ASTM E2780 Sections 9.1.3, 9.1.4, 9.1.5, and 9.1.6.	Include in the revised test report conditioning data showing the device was run at a medium burn rate.

We request that Woodstock Soapstone submit both a revised (CBI)[1] test reports along with a revised Certification of Conformity to EPA within ten (10) business days from receipt of this letter to maintain certification of the above-referenced model. The revised test reports (both CBI and non-CBI) and Certification of Conformity should be clearly identified as revised with a revision date provided. The revised test reports and Certification of Conformity should include a summary table indicating what revisions have been made and where the revisions are located in the report. Concurrently, Woodstock Soapstone must post the revised non-CBI test report on its website and provide to EPA the web address where it can be found.

Upon receipt, EPA will review the revised CBI and non-CBI test reports to determine if the revisions sufficiently address the identified problems or irregularities and verify that the reports have been posted on the website. Please submit the revised CBI and non-CBI test reports to WoodHeaterReports@epa.gov. The subject line of your email should be marked as "Wood Heater Test Report Requested Information."

Please note that we are in receipt of Woodstock Soapstone's March 22, 2021 request to renew the Certificate of Compliance for the Absolute Steel Hybrid 211 model catalytic wood heater. However, the renewal request cannot be processed until the above-identified test report problems or irregularities have been sufficiently addressed and the revised non-CBI test report posted on your website. Given that the Certificate of Compliance expired on March 22, 2021, you confirmed in your renewal request that Woodstock Soapstone will not manufacture any wood heater models listed under the above-referenced Certificate of Compliance until, and if, a renewal is issued. Upon expiration, Woodstock Soapstone (and your distributors and retailers) may not advertise and offer for sale any wood heater model under the Certificate.

[1] Manufacturers who claim that some of the information being submitted is CBI (e.g., design drawings and sensitive, detailed material specifications) must clearly mark the information. Note that emissions data cannot be claimed as CBI, including all information necessary either to determine emission rates in the format of the standard (e.g., g/hr, lb/mmBtu) or to determine whether the source complies with an applicable standard or limitation). See 40 CFR 2.301(a)(2) https://www.govinfo.gov/content/pkg/CFR-2013-title40-vol1/pdf/CFR-2013-title40-vol1-sec2-301.pdf.

This request has been coordinated with EPA's Office of Air Quality Planning and Standards and the Office of General Counsel. If you have any questions regarding this letter, please contact Rafael Sanchez of my staff at 202-564-7028 or via email at WoodHeaterReports@epa.gov.

Sincerely,

Martha Segall
Acting Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance

cc:

Steffan M. Johnson, OAQPS/MTG
Jacqueline Robles Werner, OC
Robert Scinta, OC/MAMPD
Rick Duffy, OC/MAMPD
Elizabeth Vizard, OC/MAMPD
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Danick Power, Polytests Services Inc.

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