Message

From: Seth Bailey [seth.bailey@ardisam.com]
Sent: 9/27/2021 10:03:55 PM
To: Sanchez, Rafael [Sanchez.Rafael@epa.gov]
CC: Scinta, Robert [scinta.robert@epa.gov]; WoodHeaterReports [WoodHeaterReports@epa.gov]; Yellin, Patrick [Yellin.Patrick@epa.gov]; Joseph Miller [joe.miller@ardisam.com]; Michael Furseth [michael.furseth@ardisam.com]
Subject: RE: Follow-up Serenity Pellet Stove Renewal
Attachments: Castle Serenity Renewal Request.pdf; Biennial Report - 2019-2021.pdf

Mr. Sanchez,

Thank you for your message. Please accept my sincere and anxious apology. I was unaware that my prior effort to deliver the supporting materials through a shared drive link were unsuccessful. Please allow me to try again. The following is a link to the shared file containing the materials you requested that pertain to the original certification testing. Note that I have made the contents of this link available to those with access to the WoodHeaterReports@epa.gov email address. If you would like me to give access to anyone else, please let me know and I will add them.

Serenity Pellet Stove Certificate Renewal Information

In addition to the information you requested from the original testing and certification, and those from the renewal request for which you've already confirmed receipt, I am attaching the biennial report and the signed request letter containing the model names, certification number, and the requested compliance statement. As indicated in the letter, there have been no modifications to the previously certified stove design that would alter emissions or otherwise suggest a higher likelihood of approaching or exceeding applicable emissions standards, and Ardisam Inc. is, therefore, seeking a recertification waiver from EPA.

I greatly regret that this information did not reach you previously, and I will greatly appreciate your continued support and timely review of the materials. In the interim, I will work with our IT department to remove all listings from controlled websites where the recently manufactured units may be presented, pending EPA review. I am hopefully that this will be completed tomorrow. I am happy to support any follow-on questions you may have.

Please note that, while it does not excuse the oversight in getting you the requested documentation, all stoves produced have met the current 2020 standards, and that has been the case for 5+ years, when many of the stoves on the market were relying on the grandfathering clause for compliance. There have been no stoves introduced to commerce that were produced outside the effective dates in the previous certification, and the stove has been well received by customers and has not resulted in any defect or product integrity issues that would suggest any exceedance of environmental protection agency standards. I am happy to participate in a conference call with you if the attached information is not complete and sufficient for your issuance of the approval. If there is anything I can do to expedite the process, please let me know. Thank you in advance for your understanding with regards to this error.

Sincerely,

Seth Bailey
Regulatory Compliance manager
Ardisam, Inc.
Email: seth.bailey@ardisam.com
Ph. 800-345-6007 Ext. 130

From: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Sent: Monday, September 27, 2021 2:21 PM

To: Seth Bailey <seth.bailey@ardisam.com>
Cc: Scinta, Robert <scinta.robert@epa.gov>; WoodHeaterReports <WoodHeaterReports@epa.gov>; Yellin, Patrick <Yellin.Patrick@epa.gov>; Joseph Miller <joe.miller@ardisam.com>; Michael Furseth <michael.furseth@ardisam.com>
Subject: EXTERNAL- RE: Follow-up Serenity Pellet Stove Renewal
Importance: High

Mr. Bailey,

This email is a follow-up to your email concerning the Certificate of Compliance for the Serenity pellet stove renewal. Our records show that the Certificate of Compliance for the Serenity pellet stove expired on April 21, 2021, and is thus, no longer valid. Upon reviewing Ardisam, Inc.'s website at https://www.castlestoves.com/products/serenity-pellet-stove, we found that you advertise and offer sale the above-referenced model.

According to the 2015 New Source Performance Standards (NSPS) for New Residential Wood Heaters (Subpart AAA) at § 60.533(i), a manufacturer must request the renewal of a model line's Certificate of Compliance every five years. See below

Renewal of certification. (1) The manufacturer must request renewal of a model line's certificate of compliance or recertify the model line every 5 years, or the manufacturer may choose to no longer manufacture or sell that model line after the expiration date. If the manufacturer chooses to no longer manufacture that model line, then the manufacturer must submit a statement to the Administrator to that effect.

Furthermore, according to § 60.538, a manufacturer is not permitted to advertise for sale, offer, or sell a heater that doesn't comply with the 2020 PM emissions. See below:

(c)(1) No commercial owner is permitted to advertise for sale, offer for sale or sell an affected wood heater permanently labeled under § 60.536 (b) through (d), as applicable, unless:
(i) The affected wood heater has been certified to comply with the 2015 or 2020 particulate matter emission standards pursuant to § 60.532, as applicable.

Therefore, within ten calendar days of receiving this email, we ask that Ardisam, Inc. cease the advertisement and sale of the above-referenced model and confirm that you will notify any distributors and retailers of the need to cease the advertising and sale of the above-referenced model.

Finally, we are in receipt of your May 14, 2021, revised test report (March 5, 2021), and Certification of Conformity documents. However, the submitted revised test report is incomplete as raw data sheets, laboratory technician notes, calculations, and other required documentation are missing. If you don't submit a complete non-CBI revised test report at this time, we will review the test report submitted initially to obtain certification and proceed with the renewal process. In addition, Ardisam, Inc. must submit a signed request letter from an authorized company officer listing the model name(s), certification number, and a compliance

statement. In the letter, if no modifications have been made since the last EPA certification, the manufacturer may request a potential waiver from certification testing. That is, you must affirm in your letter that no changes have been made to the stove that will cause wood heaters in the model line to exceed applicable emission limits. With that affirmation, you must state that Ardisam, Inc. is seeking a recertification waiver from the Agency.

Upon reviewing the submitted documentation, we will ascertain whether an updated Certificate of Compliance can be granted for the model line.

If an updated Certificate of Compliance is issued for the model line, you may resume the advertisement and sale of the model line.

If you have any further information EPA should consider with respect to the status of your Certificate of Compliance, EPA is extending you an opportunity to advise the Agency via a conference call, or in writing, of any such information. To request such an opportunity to confer, please get in touch with me at WoodHeaterReports@epa.gov. If you have any questions, please let me know.

Would you please acknowledge receipt of this email?

Rafael Sanchez, Ph.D.
Wood Heater Program Lead
Air Branch
Monitoring, Assistance, and Media Programs Division
Office of Compliance
U.S. Environmental Protection Agency (EPA)
Room 7149-D
1200 Pennsylvania Ave., NW
MS:2227A
Washington, DC 20460
Ph. 202-564-7028
Teleworking on Mondays, Wednesdays, and Fridays, ph. 202-844-6993

Questions about Wood Heaters or Certifications? Please send them to WoodHeaterReports@epa.gov

Are you looking for a wood heater or central heater? Please try our fully searchable EPA Certified Wood Heater Database (https://www.epa.gov/compliance/epa-certified-wood-heater-database).

From: Sanchez, Rafael
Sent: Friday, May 14, 2021 12:39 PM
To: Seth Bailey <seth.bailey@ardisam.com>
Cc: Yellin, Patrick <Yellin.Patrick@epa.gov>; Scinta, Robert <scinta.robert@epa.gov>

Subject: RE: Certification renewal process
Importance: High

Mr. Bailey,

.zip files may work, depending on size. Also, dropbox or FTP can be used. Regarding the sales data, submit only the last two years.

Rafael Sanchez, EPA

From: Seth Bailey <seth.bailey@ardisam.com>
Sent: Friday, May 14, 2021 11:57 AM
To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Cc: Yellin, Patrick <Yellin.Patrick@epa.gov>; Scinta, Robert <scinta.robert@epa.gov>
Subject: RE: Certification renewal process

Rafael,

Thank you very much for the prompt response. That answers most of my questions, but I have two follow-up questions:

1) Do you accept .zip or .rar files? Looking at the data, it appears the files amount to 60-70 MBs if I'm including all the supporting files. I know some email security systems reject compression files, and I just want to make sure that's not the case for EPA.
2) For the biennial report, would you like my to include the previous two years of sales, or do you just want the last year (starting from the where the previous biennial report I submitted left-off and carrying through the end of the certification period)?

Seth Bailey
Regulatory Compliance manager
Ardisam, Inc.
Email: seth.bailey@ardisam.com
Ph. 800-345-6007 Ext. 130

From: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Sent: Friday, May 14, 2021 10:40 AM
To: Seth Bailey <seth.bailey@ardisam.com>
Cc: Yellin, Patrick <Yellin.Patrick@epa.gov>; Scinta, Robert <scinta.robert@epa.gov>
Subject: EXTERNAL- RE: Certification renewal process
Importance: High

Mr. Bailey,

Thank you for your email. To get your renewal processed, please submit the following documents:

1. Full revised test report including raw data and supporting documentation.
2. Certification of conformity updated (CoC must include a summary table showing all revisions made to the report).
3. Last certificate of compliance.

4. Signed letter from your Company stating that you are seeking renewal and affirming in writing that the wood heaters in the model line continue to be similar in all material
respects that would affect emissions to the representative wood heater submitted for testing on which the original certificate of compliance was based and requesting a potential waiver from certification testing.
5. Biennial report. Sales data for the model for the last two years.

Please submit the revised test reports (both CBI and non-CBI), signed letter, sales data, and Certification of Conformity to WoodHeaterReports@epa.gov. If you have any questions, please let me know.

Rafael Sanchez, Ph.D.
Wood Heater Program Lead
Air Branch
Monitoring, Assistance, and Media Programs Division
Office of Compliance
U.S. Environmental Protection Agency (EPA)
Room 7149-D
1200 Pennsylvania Ave., NW
MS:2227A
Washington, DC 20460
202-564-7028
202-564-0050 fax
Teleworking on Mondays, Wednesdays, and Fridays (571-236-1927)

Questions about Wood Heaters or Certifications? Send them to WoodHeaterReports@epa.gov

Are you looking for a wood heater or central heater? Please try our fully searchable EPA Certified Wood Heater Database (https://www.epa.gov/compliance/epa-certified-wood-heater-database).

From: Seth Bailey <seth.bailey@ardisam.com>
Sent: Friday, May 14, 2021 11:01 AM
To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Subject: Certification renewal process

Hello Mr. Sanchez,

I have been working with the Intertek test lab that certified our Castle Serenity pellet stove for EPA emissions approximately 5 years back on emission certification renewal. Intertek has provided the attached documents in support of certificate renewal.

The engineer at Intertek, Brian Ziegler, suggested that I reach out to you to inquire as to what information you need for a certification renewal and how you would like that information to be submitted. He also said to mention that since we were going through the review process for the purpose of renewal, that there were some issues with many industry reports found by an ADEC review, and he wanted me to let you know that the attached revised report corrects those issues.

If you would kindly let me know whether you need more information in addition to what is attached in this email, as well as how you would like the information submitted, that would be very much appreciated. I want to make sure I'm not missing anything needed for your review.

Thank you very much in advance,

Seth Bailey
Regulatory Compliance manager
Ardisam, Inc.
Email: seth.bailey@ardisam.com
Ph. 800-345-6007 Ext. 130