UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

April 22, 2022

Mr. Jeff Bunsey
Senior Manager
Enerco Group, Inc.
4560 West 160th Street
Cleveland, Ohio 44135

Re: Updated Certificate of Compliance Number 189-19 for PS60W, PS60WTS, C80XL, H80XL, J80XL, and N80XL Pellet Fuel Room Heaters Models

Dear Mr. Bunsey:

The United States Environmental Protection Agency has reviewed the August 31, 2021,[1] certification test report documenting the retest of the above-referenced models and the September 1, 2021,[2] Certification of Conformity, including supporting documentation. As a result of our review, the EPA has determined that the retest is a valid certification test demonstrating compliance with the applicable emission standard and conducted in accordance with the 2015 New Source Performance Standard (NSPS) for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces at 40 CFR Part 60, Subpart AAA (2015 NSPS). Therefore, the EPA is reissuing Certificate of Compliance Number 189-19 with the updated emissions rate, heat output range, overall heating efficiency, and carbon monoxide emission rate resulting from the certification retest and as provided below. Based upon the test report documenting the retest and the Certification of Conformity, we are adding the following models: PS60WTS, C80XL, H80XL, J80XL, and N80XL to the above-referenced Certificate of Compliance and Wood Heater Database. [3] Certification under the 2015 NSPS is valid through April 22, 2027, and you may advertise and sell the above-referenced models. Please refer to the above Certificate of Compliance number in all future correspondence.

Based on the above-referenced test report prepared by Intertek Building & Construction (B&C) demonstrating compliance with the American Society for Testing and Materials (ASTM) E2515-17 test method, ASTM E2779-17 test method, and the 2020 particulate matter emission standard, as well as the information provided in your January 28, 2022 application, the above-referenced models are certified as

[1] Revised on September 29, 2021, January 25, 2022, February 18, 2022, and April 7, 2022.
[2] Revised on September 29, 2021, January 26, 2022, February 14, 2022, February 24, 2022, and April 7, 2022.
[3] As additional support, the manufacturer also submitted a January 31, 2022 Declaration of Conformity affirming that the newly added models are similar in every aspect to the PS60W model except for varying hopper sizes.

meeting the 2015 NSPS. Under the 2015 NSPS and based on Intertek Testing Services NA, Inc.'s above-referenced Certification of Conformity, the models' emission rate of 0.73 g/hr. meets the 2020 particulate matter emission standards of 2.0 g/hr. per 40 CFR §60.532(b). The heat output range and efficiency for the above-referenced models are 9,739 – 28,165 Btu/hr and 81%, respectively. This model line's carbon monoxide emission rate is 0.677 g/min.

In reissuing Certificate of Compliance Number 189-19 with the above certification test data results, the initial Certificate of Compliance dated April 25, 2019, should not be relied upon for such results and should no longer be referenced in any advertising and marketing materials. Therefore, for the above-referenced models, you must conduct the following:

1. Revise the Owner's Manual with the updated emissions rate, heat output range, overall heating efficiency, and carbon monoxide emission rate, and post the revised Owner's Manual on your website;

2. Ensure each unsold heater offered for sale by a commercial owner is accompanied by an Owner's Manual that must contain the above-referenced updated information;

3. Revise all advertising and marketing materials consistent with the results of the certification retest; and

4. Revise the permanent label for the above-referenced models to reflect the results of the certification retest and affix the revised permanent label to all heaters manufactured after the date of receipt of this Certificate of Compliance letter.

You must submit the revised Owner's Manual and a revised permanent label to WoodHeaterReports@epa.gov within thirty (30) business days of receipt of this Certificate of Compliance letter. The subject line of your e-mail should contain "Certificate of Compliance Number 189-19 – Revised Owner's Manual and Permanent Label."

This Certificate of Compliance is valid for the above-referenced models and cannot be transferred to another model line without applying for another Certificate of Compliance. This Certificate of Compliance allows you to advertise and sell the above-referenced models through April 22, 2027. Thereafter, you may not advertise for sale, offer for sale, or sell heaters under this Certificate of Compliance without applying for and obtaining another Certificate of Compliance.

All heaters manufactured or sold under this Certificate of Compliance must comply with EPA labeling requirements found at §60.536. These provisions require each wood heater to have a permanent label affixed to it, including the month and year of manufacture, model name or number, serial number, certification test emission value, test method, standard met, and compliance certification statement. In addition, you must comply with all applicable requirements of the regulation, including:

1. Conducting a third-party certifier-approved quality assurance program that ensures that all units within a model line are similar to the heater submitted for certification testing in all respects that would affect emissions and are in compliance with the applicable emission limit, pursuant to §60.533(m);

2. Applying for recertification whenever any change is made to the above-referenced models that affect or is presumed to affect the particulate matter emission rate for the model line, pursuant to §60.533(k)(1);

3. Providing an owner's manual that includes the information listed in §60.536(g)(1) with each affected wood heater model offered for sale;

4. Placing a copy of the certification test report and summary on the manufacturer's website. The test report and summary shall be available to the public within 30 days after the EPA issues a Certificate of Compliance, pursuant to §60.533(b)(12);

5. Submitting a report to the EPA every two years following issuance of a Certificate of Compliance for each model line. This report must include the sales for each model by state and certify that no changes in the design or manufacture of this model line have been made that require recertification under §60.533(k);

6. Retaining records and submitting reports as required at §60.537; and

7. Submitting heaters for audit testing if selected by the EPA under §60.533(n)(1)(i) and (2)(i).

Failure to comply with these requirements may result in revoking this Certificate of Compliance and enforcement action, including penalties as specified under the Clean Air Act. To promote transparency in implementing the Wood Heater Program, we suggest that manufacturers submit a copy of the test report and the Uniform Resource Locator (URL) or web address where the test report is posted to WoodHeaterReports@epa.gov within ten (10) days of posting the test report.

Once EPA has verified that the full non-CBI certification test report has been posted on the manufacturer's website, the Agency will add the above-referenced models to the EPA-Certified Wood Heater Database. If you have any questions concerning this letter, please contact the Wood Heater Program at WoodHeaterReports@epa.gov.

Sincerely,

Digitally signed by ANTHONY MILLER
Date: 2022.04.22 12:35:42 -06'00'

Anthony J. Miller
Acting Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance
Office of Enforcement and Compliance Assurance

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