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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

September 20, 2021

Mr. Matthew Romanow
Director, Engineering
Innovative Hearth Products
1502 14th Street NW
Auburn, Washington 98001

Re: Renewal of Certificate of Compliance Number 58-16 for the Montecito Estate CAT and WCT6904WS Catalytic Wood Heaters

Dear Mr. Romanow:

I am pleased to inform Innovative Hearth Products (IHP) that the above-referenced models have been approved for renewal of a Certificate of Compliance pursuant to 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) by the United States Environmental Protection Agency (EPA). Pursuant to the 2015 NSPS, this Certificate of Compliance is valid through September 20, 2026. This letter serves as your wood heater Certificate of Compliance. Please refer to the above Certificate of Compliance number in all future correspondence.

In accordance with the 2015 Wood Heater Rule at 40 CFR Part 60, §60.533(i)(2), a manufacturer of a heater model line may apply to EPA for renewal of the model line's Certificate of Compliance. To do so, the manufacturer may affirm in writing that the heaters in the model line continue to be similar in all material respects that would affect emissions to the representative heater submitted for testing on which the original Certificate of Compliance was based. In making such an affirmation, the manufacturer also may request a potential waiver from certification testing.

Based on a June 28, 2016 (revised on September 7, 2016, June 30, 2021, and September 13, 2021) test report by Dirigo Laboratories Inc. (Now PFS-TECO), an August 10, 2016 (revised on June 30, 2021, and September 13, 2021), Certification of Conformity by PFS-TECO, and your June 21, 2021, request for renewal of the Certificate of Compliance, EPA has determined that the model line continues to meet the certification requirements at §60.533. Therefore, pursuant to §60.533(i)(2), EPA is waiving certification testing for the above-referenced models. IHP may not advertise for sale, offer for sale or sell heaters under this Certificate of Compliance after September 20, 2026, without applying for and being issued another Certificate of Compliance with an updated expiration date.

All wood 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, IHP must comply with all applicable requirements of the regulation, including:

1. Conducting a third-party certifier-approved quality assurance program which ensures that all units within a model line are similar to the wood 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 or obtaining a recertification waiver from EPA 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. 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);

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

6. Submitting wood 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. If you have any questions concerning this letter, please contact Rafael Sanchez of my staff at (202) 564-7028 or via email at WoodHeaterReports@epa.gov.

Sincerely,

Digitally signed by ANTHONY MILLER
Date: 2021.09.20 14:23:50 -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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