



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
COMPLIANCE

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Compliance Reminder for Manufacturers of New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces: Reporting and Recordkeeping Requirements

Dear Manufacturer:

On February 3, 2015, the U.S. Environmental Protection Agency (EPA) updated its clean air standards for residential wood heaters to make new heaters significantly cleaner and improve air quality in communities where people burn wood for heat. The updates, which are based on improved wood heater technology, strengthen the emissions standards for new woodstoves, while establishing the first-ever federal air standards for previously unregulated new wood heaters, including outdoor and indoor wood-fired boilers (also known as hydronic heaters), indoor wood-fired forced air furnaces, and single burn-rate woodstoves.

It has come to the attention of the EPA that some manufacturers of residential wood heaters, hydronic heaters, and forced-air furnaces may not be complying with certain reporting and recordkeeping requirements of the 2015 Wood Heater Rule¹. This letter is intended to remind manufacturers of the obligation to comply with the following 2015 Wood Heater Rule reporting and recordkeeping requirements:

- Post a complete copy of the non-confidential business information (non-CBI) certification test report(s) (along with the summary of the test report) on the manufacturer's website;
- Implement a quality assurance plan that is approved and audited by a third party certifier; and
- Submit a report to the EPA every 2 years following issuance of a certificate of compliance for each model line that includes sales information and a certification that no changes have been made to the model line (biennial report).

Note that §60.533(a) and §60.5475(a)(1) state that each affected wood stove, hydronic heater, and forced-air furnace must be in compliance with all the requirements of subparts AAA and QQQQ. Manufacturers must comply with such requirements in order to maintain a certification of compliance for a certified model line under the Clean Air Act (CAA).

¹ The 2015 Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces (40 CFR Part 60 Subparts AAA and QQQQ) was published in the Federal Register on March 16, 2015 (80 Fed. Reg. 13671) and became effective on May 15, 2015.

Below each reporting and recordkeeping requirement is explained to assist manufacturers. EPA is also requesting that manufacturers of models that have been EPA-certified for 30 days or more immediately send the Uniform Resource Locator (URL), or web address, of all posted non-CBI certification test reports and summaries by email to WoodHeaterReports@epa.gov.

Post Non-CBI Certification Test Reports on Manufacturer's Website

The 2015 Wood Heater Rule requires certification test data be available to the public on the internet. Specifically, manufacturers are required to post a complete non-CBI test report along with the test report data summary on their websites. As provided in §60.537(g) and §60.5479(g):

Within 30 days of receiving a certification of compliance for a model line, the manufacturer must make the full non-CBI test report and the summary of the test report² available to the public on the manufacturer's Web site.

Consistent with §114 of the CAA, the 2015 Wood Heater Rule states that "emission data, including all information necessary to determine compliance, except sensitive engineering drawings and sensitive detailed material specifications, may not be claimed as CBI." See §60.537(f) and §60.5479(f). Emissions data, as defined in 40 CFR 2.301(a)(2)(i), include, but are not limited to, information necessary to determine the identity, amount, frequency and concentration of any emission; description of the manner or rate of operation of the source; and description of the device, installation, or operation constituting the source.

To ensure compliance with the above-referenced requirement, we suggest that manufacturers submit the URL or web address where the complete non-CBI test report(s) and summary of each test report are posted to WoodHeaterReports@epa.gov within 10 business days of posting. As stated above, for models that have already been EPA-certified for 30 days or more, please send the test report and summary of the test report URL or web address to the above email address immediately upon receipt of this letter. Additionally, any future requests for certification or re-certification will not be approved until the manufacturer has posted complete non-CBI test reports for models that have already been EPA-certified for 30 days or more.

Implement Quality Assurance Program

In accordance with the 2015 Wood Heater Rule, on or after May 16, 2016, for each EPA certified model line, manufacturers must implement a quality assurance program that satisfies the following requirements of §60.533(m)(1) through (5) for residential wood heaters or §60.5475(m)(1) through (5) for residential hydronic heaters, forced-air furnaces, and other central heaters:

1. Include specific inspection and testing requirements for ensuring that all units within a model line are similar in all material respects that would affect emissions to the wood heater submitted for certification testing and meet the emissions standards in §60.532 or §60.5474;

² The summary of the test report must include a table that clearly presents the individual and overall (weighted average) emission rates, efficiencies, and heat outputs. See §60.533(b)(5) or §60.5475(b)(5).

2. Must be approved by the third-party certifier as part of the certification of conformity process specified in §60.533(f) or §60.5475(f);
3. Include regular (at least annual) unannounced audits by the third-party certifier under ISO-IEC Standard 17065 to ensure that the manufacturer's quality assurance plan is being implemented;
4. Include a report for each audit under ISO-IEC Standard 17065 that fully documents the results of the audit. The third-party certifier must be authorized and required to submit all such reports to the Administrator and the manufacturer within 30 days of the audit. The audit report must identify deviations from the manufacturer's quality assurance program and specify the corrective actions that need to be taken to address each identified deficiency;
5. Within 30 days after receiving each audit report, the manufacturer must report to the third-party certifier and to the Administrator its corrective actions and responses to any deficiencies identified in the audit report. No such report is required if an audit report did not identify any deficiencies.

The requirement to conduct a quality assurance plan applies to new certifications as well as for units that were deemed certified, or allowed automatic compliance, under the 2015 Wood Heater Rule (for deemed certified units see §60.533(h)(1) and §60.5475(a)(3) through §60.5475(a)(7)).

Biennial Report

The 2015 Wood Heater Rule requires manufacturers submit to the EPA a biennial report for each model line. This notification must include the following:

1. Certification that no changes in the design or manufacture of the model line have been made that would require recertification under §60.533(k) or §60.5475(k).
2. Sales information for the two year period by state for each model line certified. See §60.537(d) or §60.5479(d).

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

Sincerely,



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