

AIR POLLUTION CONTROL DIVISION
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August 11, 2009

Mr. Rick Davis
Sequoyah Paradise
W8359 Hwy 82
Mauston, WI 53948**SUBJECT:** Certification of Model "E3300B" Outdoor Wood Boiler under Section 5-205 of the Vermont Air Pollution Control Regulations

Dear Mr. Davis:

The Air Pollution Control Division (APCD) has completed its review of the information Sequoyah Paradise recently submitted to this office, including the test report dated October 30, 2008 (Number: 3161682MID-007) prepared by Intertek Testing Services NA, Inc., regarding your Model "E3300B" outdoor wood-fired boiler (OWB). The test results indicate that the Model E3300B's particulate matter emissions were 0.28 lbs/million BTUs of heat input (year round weighted average) and 0.56 lbs/million BTUs of heat output (year round weighted average). The year round weighted average emissions of the unit were lower than Vermont's emission limit of 0.44 lbs/million BTUs of heat input; however, the year round weighted average emissions on an output basis were higher than Vermont's proposed Phase II limit of 0.32 lbs/million BTUs of heat output. USEPA has reviewed the Intertek test report and has approved the test methods and results. The test methods used by Intertek are also acceptable under §5-205 of Vermont's regulations. Since USEPA has approved the test results and the testing was performed by an EPA accredited laboratory, the APCD is willing, for this particular test series, to waive the requirements in §5-205 regarding prior notice of the testing and submission of a test protocol to the APCD.

Thank you for providing this office with detailed engineering drawings and specifications for the Model E3300B, as required by §5-205(d)(1). This information was submitted on August 5, 2009 and earlier dates and, together with the test data, comprises your application for certification of the Model E3300B. We will expect that all units in this model line will have the same specifications, within acceptable manufacturing tolerances, and that any components of these units that may affect emissions will be composed of the same materials as those in the tested unit. Please let me know immediately if this assumption is not accurate.

Based on the APCD's and USEPA's review of the information submitted by Sequoyah Paradise, and the conditions noted above concerning specifications and materials, the APCD has determined that the Model E3300B OWB complies with the emission limit in §5-205(c)(1) of the Air Pollution Control Regulations (APCR) and that all units within the "E3300B" model line may be distributed or sold in Vermont or for installation in Vermont on or after the date of your

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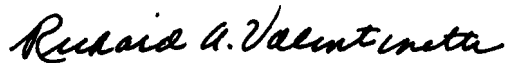


receipt of this letter. This certification shall expire five (5) years after the date of its issuance, unless prior to such time the Vermont Agency of Natural Resources adopts a more stringent particulate matter emission limit for new OWBs (e.g., the proposed Phase II emission limit). In that event, Sequoyah Paradise may be required to reapply for certification of the model line under the new emission limit, if the model line would comply with it.

I would like to take this opportunity to remind you of a related obligation that Sequoyah Paradise has under APCR §5-205(e), "Notification by Manufacturers". When an OWB model is certified, this subsection requires the manufacturer to give written notification to its dealers and others who sell or may be selling your OWBs in Vermont or for installation in Vermont. This notice should list all the OWB models you sell and specifically identify the Model E3300B as a model that has been approved for sale or installation in Vermont. Please provide a copy of this written notice and a list of the addressees and their locations to this office when your mailing is completed.

Thank you for your interest in reducing the air contaminant emissions from outdoor wood-fired boilers. If you have any questions about this letter, please contact me or Chris Jones of my staff at (802) 241-3840.

Sincerely,



Richard A. Valentinetti, Director
Air Pollution Control Division

cc: Amanda Aldridge, EPA/OID, RTP, NC
Lisa Rector, NESCAUM