



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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

May 12, 2022

Mr. Paul Wells
Technical Director
A.J. Wells & Sons Ltd.
Bishops Way, Newport
Isle of Wight PO30 5WS
United Kingdom

Re: Certificate of Compliance Number 260-20 for Charnwood Skye E700 Non-Catalytic Cord
Wood Heater Model

Dear Mr. Wells:

The United States Environmental Protection Agency has reviewed the March 14, 2022, certification test report documenting the retest of the above-referenced model and the March 16, 2022, 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 260-20 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. We will also be updating the EPA Certified Wood Heater Database to reflect the new values. Certification under the 2015 NSPS is valid through May 12, 2027, and you may advertise and sell the above-referenced model. Please refer to the above Certificate of Compliance number in all future correspondence.

Based on the above-referenced test report prepared by PFS-TECO demonstrating compliance with the February 28, 2018, EPA-approved Cord Wood Alternative Test Method 125 (ATM-125) and the information provided in your March 14, 2022, application, the above-referenced model is certified as meeting the 2015 NSPS.¹ Under the 2015 NSPS and based on PFS TECO's March 16, 2022,

¹ On January 24, 2022, EPA announced the withdrawal of broadly applicable alternative test method approval decisions for Alternatives 125 and 127 (or ALT-125 and ALT-127) that the Agency made in 2018 under the 2015 Wood Heater Rule allowing changes to the ASTM E3053 test method. The withdrawal of ALT-125 and ALT-127 test methods became effective on February 23, 2022. See 87 FR 3532 and <https://www.federalregister.gov/documents/2022/01/24/2022-01298/withdrawal-of-broadly-applicable-alternative-test-methods>.

Certification of Conformity, the model's emission rate of 1.7 g/hr meets the 2020 NSPS cordwood particulate matter emissions limit of 2.5 g/hr. The heat output range and overall heating efficiency for the above-referenced model are 10,520 – 29,850 BTU/hr and 77%, respectively. The carbon monoxide emission rate for this model line is 0.8 g/min.

In reissuing Certificate of Compliance Number 260-20 with the above certification test data results, the initial Certificate of Compliance dated May 29, 2020, 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 model, 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 model 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 260-20 – Revised Owner's Manual and Permanent Label."

This Certificate of Compliance is valid for the above-referenced model 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 model through May 12, 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 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 model that affects 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 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).

If you apply for renewal of your Certificate of Compliance pursuant to 40 C.F.R. § 60.533(i)(1) which was previously certified using ALT-125 or ALT-127, you must conduct a valid certification test in accordance with the 2015 Wood Heater Rule and the test methods and procedures in 40 C.F.R. § 60.534 and follow all other procedures as set forth in 40 C.F.R. § 60.533(i)(2). The EPA will not grant a waiver from certification testing upon receipt of a renewal request.

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. Pursuant to the EPA-approved ATM ALT-125, you must also include your approval letter in the certification test report for posting on your website. 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 model 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,

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