

Implementation of the 2015 Wood Heater Rule (Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces (40 CFR Part 60, AAA & QQQQ))

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Overview

- EPA Wood Heater Program
- Certification Process
- EPA Inspections
- Wood Heater Recordkeeping and Reporting Requirements
- WH Rule Implementation Issues
- WH Delegation of Authority
- Future Projects/Improvements

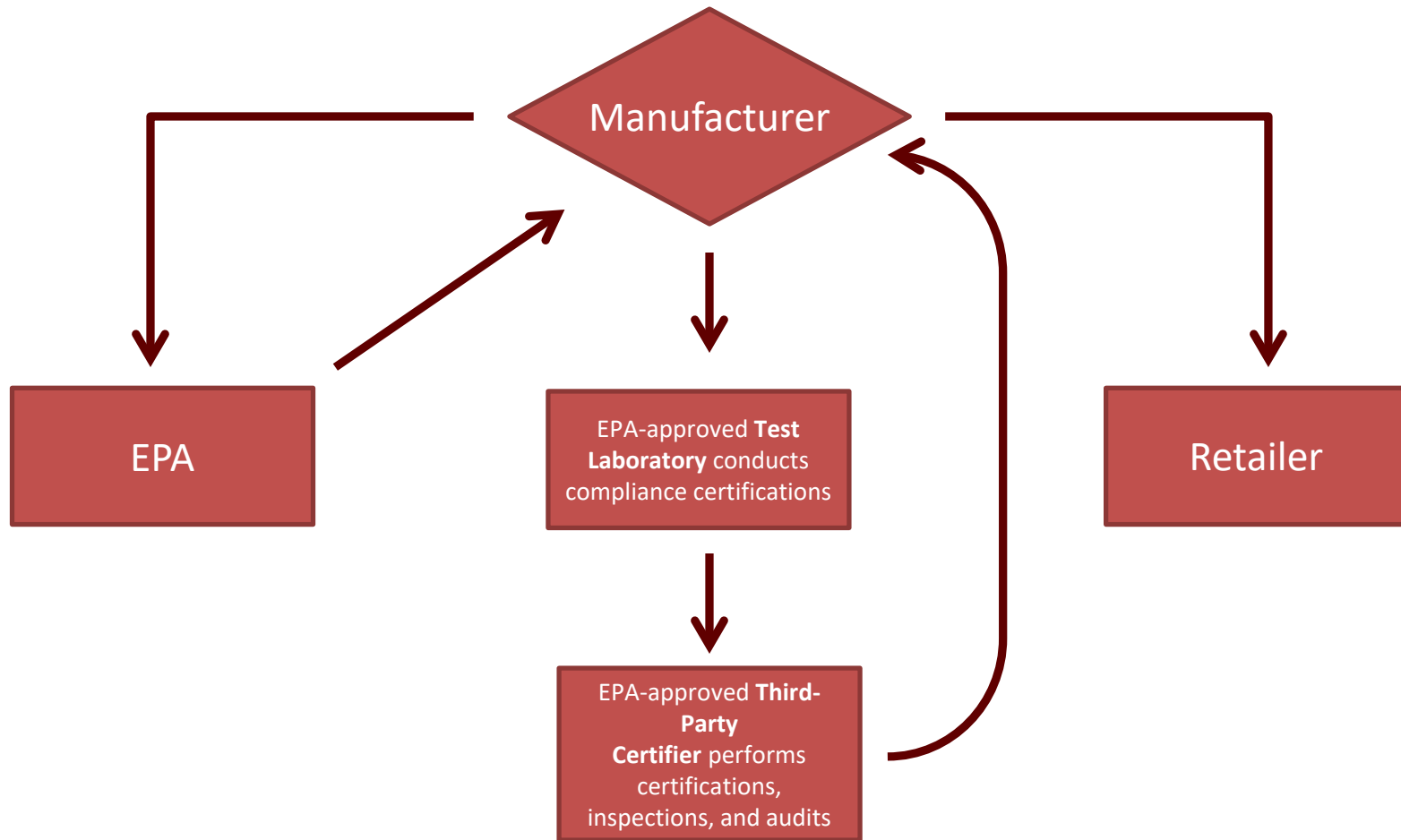


EPA Wood Heater Program

- Certify Wood Heaters.
- Conduct Inspections.
- Issue applicability determinations.
- Respond to Congressional, Industry, and Public Inquiries.
- Maintain EPA-Certified Wood Heaters Lists.
- Maintain the EPA Compliance Monitoring [Wood Heater Website](#).
- Promote delegation of the Wood Heater Rule.



Certification Process Flowchart





Types of EPA Certification

- Certificate of Compliance
 - Valid for five years from issuance.
- Renewal of Certification
 - Valid for five years from issuance.
- Recertification (aka Design Change)



Applying for EPA Certification

- A complete Wood Heater (WH) Application Package must include the following:
 - Certification test reports (CBI and Non-CBI) prepared by an EPA-approved test laboratory.
 - Performance test data (test report) must be submitted within 60 days after a compliance test.
 - Certification of conformity by an EPA-approved third-party certifier.
 - Quality assurance plan.
 - All required [manufacturer statements](#).
 - Above-referenced information along with [WH Application](#) can be sent to WoodHeaterReports@epa.gov.



Steps to Follow After EPA Approval and Receipt of Certificate of Compliance

Manufacturer

- Post a full non-CBI test report to their website within 30 days.
- Within ten (10) days of posting the test report, submit the web address for the posted test report to EPA.

EPA

- Verify that the full non-CBI certification test report has been posted on the manufacturer's website.
- After verification is complete, EPA will add the new model(s) to the EPA-Certified Wood Heater List.



Design Change Requests

- A complete design change request must include the following:
 - A signed letter by the company's authorized official requesting a design change and describing in detail the proposed modification to the heater.
 - Engineering drawings of the proposed designed change.
 - Application (request) must be reviewed for conformity with the wood heater rule by the contracted third-party certifier.
 - Helpful to include:
 - A comparative diagram
 - Test report summary
 - Certificate of compliance



Design Change Requests

- Recertification is required when changes in the design or manufacture of the model line have been made that affects the particulate matter emission rate for that model line.
- EPA may waive the certification requirement upon written request by the manufacturer.
 - Manufacturer must present adequate rationale for the EPA to determine that the change may not reasonably be anticipated to cause wood heaters in the model line to exceed the applicable emission limits



Certification Renewals

- A manufacturer:
 - Must request renewal of a model line's certificate of compliance every 5 years; OR
 - May choose to no longer manufacture OR sell that model line after the expiration date.
 - If no longer manufacturing a model line, then the manufacturer must submit a statement to the EPA to that effect.



Certification Renewals

- EPA may approve a renewal of a certificate of compliance if a manufacturer:
 - Certifies that no changes in the design or manufacture of the model line have been made that require recertification;
 - Requests a waiver from certification testing; and
 - Includes a copy of the third-party certifier letter of conformity.



EPA Inspections

- An EPA inspector may inspect:
 - Manufacturers
 - Retailers
 - EPA-approved test laboratories
 - EPA-approved third-party certifiers



EPA Inspection

Manufacturer

- Notify EPA Regional Office and State Regulators
- Opening Conference
- Records Review
- Inspection
- Closing Conference
- Compliance Assistance

EPA-Approved Test Laboratory and Third-Party Certifier

- Notify EPA Regional Office and State Regulators
- Opening Conference
- Records Review
- Closing Conference



EPA Inspection

Retailers

- Notify EPA Regional Office and State Regulators
- Opening Conference
- Inspection
- Closing Conference
- Compliance Assistance



WH Rule Implementation Issues

Not posting the full non-CBI certification test report within 30 days after issuance of the certificate of compliance.

- Issued a [Compliance Reminder letter](#) to manufacturers.
- During inspections, remind manufacturers to post test reports.
- Make phone calls and email manufacturers to remind them to post the test reports.
- Verify manufacturer's website prior to adding any new model(s) to EPA-Certified List.

Not submitting biennial reports.

- Issued a [Compliance Reminder letter](#) to manufacturers.
- During inspections, remind manufacturers to submit biennial reports.
- Make phone calls and email manufacturers to remind them to submit the biennial reports.

Submitting incomplete and/or inaccurate Wood Heater Application, i.e., Test Reports, Certificate of Conformity, Quality Assurance Plan.

- Directly communicated with the affected manufacturer by phone and email to correct any Application deficiency.
- Developed a form (application) to assist manufacturers.
- Developing Electronic Reporting Tool.



WH Rule Implementation Issues

Advertising uncertified heaters (i.e., models capable of burning wood and coal).

- Directly communicate with the affected manufacturer or retailer to remove any advertisement or reference to uncertified heaters.
- Monitor retailer websites.

Selling uncertified heaters, i.e., coal/wood and exempt models (sell-through heaters).

- During inspection, look for uncertified heaters and request the removal of uncertified heaters from the floor, when found.



WH Delegation of Authority

- Some implementation and enforcement authority may be delegated to a State, local or tribal authority upon request.
- EPA encourages State, local or tribal delegation.



Future Projects/Improvements

- Searchable Wood heater database.
- Revised WH application form (as well as other EPA forms).
- Electronic Reporting Tool.
- Revised EPA WH Monitoring Website.



Additional Resources

- [Small Entity Compliance Guide for ‘Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces’](#)
- [Compliance Reminder for Manufacturers of New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces: Reporting and Recordkeeping Requirements](#)
- www.epa.gov/burnwise
- www.epa.gov/compliance/wood-heater-compliance-monitoring-program