



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

September 4, 2020

Mr. Alexander Marcakis
Engineering Department
Supreme Fireplaces Inc.
3594 Jarry East
Montreal
Quebec, Canada
H1Z 2G4

Re: Updated Certification Letter Number 102-17 for Astra 24 24SFC and Novo 24 – Cast Iron Non-Catalytic Wood Heater Models

Dear Mr. Marcakis:

The United States Environmental Protection Agency (EPA) is in receipt of your July 7, 2020, letter regarding the above-referenced certificate of compliance letter. This certificate currently includes the Astra 24 24SFC model. Supreme Fireplaces Inc. (Supreme) is requesting that the above-referenced certificate be updated to add the Novo 24 – Cast Iron model. According to Supreme, the Novo 24- Cast Iron model will be manufactured exactly the same as the current certified model except for aesthetic changes applied to the exterior of the heater. Supreme affirms that the design changes will not cause wood heaters within the model line to exceed applicable emission limits.

In accordance with the 2015 Wood Heater Rule, a manufacturer must recertify a model line whenever any change is made in the design that affects or is presumed to affect the particulate emission rate for that model (Sections §60.533(k)(1) and (k)(2)). However, pursuant to the Rule, EPA may waive the recertification requirement if the manufacturer presents adequate rationale, and EPA determines that the change may not reasonably be anticipated to cause heaters in the model line to exceed the applicable emission limits.

Based on a July 11, 2017 (revised on November 28, 2017), test report by Services Polytests Inc., a July 3, 2020, certificate of conformity by PFS TECO, and the information provided in your July 7, 2020, letter, EPA has determined that the proposed design changes are unlikely to cause the model line to exceed the emission rate of 1.9 g/hr. An emission rate of 1.9 g/hr meets the 2020 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 particulate matter emission limit of 2.0 g/hr. Therefore, pursuant to §60.533(k)(1), EPA is waiving certification testing for the Novo 24 – Cast Iron model, and we have updated the above-referenced certificate number and the EPA Wood Heater Database to include the new model. Please refer to the above-referenced certification letter number in all future correspondence.

Certification under the 2020 NSPS Standard is valid through December 14, 2022, and no separate certification is required. This certification is valid for the above-referenced models and cannot be transferred to another model line without applying for certification. This certification allows Supreme to manufacture and sell the above-referenced models through December 14, 2022. Thereafter, Supreme may not manufacture, advertise for sale, offer for sale, or sell wood heaters under this certificate without applying for and being issued another compliance certification.

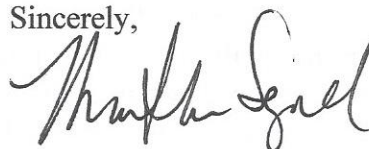
All wood heaters manufactured or sold under this certification must comply with EPA labeling requirements found at §60.536. These provisions require each wood heater to have a permanent label affixed to it that includes the month and year of manufacture, model name or number, serial number, certification test emission value, test method, standard met, and compliance certification statement.

In addition, Supreme 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 whenever any change is made to 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. 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);
4. Retaining records and submitting reports as required at §60.537; and
5. 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 a revocation of this certification 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 sanchez.rafael@epa.gov.

Sincerely,



Martha Segall
Acting Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance