



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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

January 24, 2023

Robert Beck
President
Thelin Hearth Products, LLC
63 Laxalt Drive
Carson City, Nevada 89706

Re: Gnome Pellet Heater Model; Certificate of Compliance Number 74-16

Dear Mr. Beck:

The United States Environmental Protection Agency has reviewed the October 26, 2022¹, certification test report documenting the retest of the above-referenced model and the October 26, 2022², Certification of Conformity, including supporting documentation. As a result of our review, the EPA has determined that the test 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 74-16 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. Certification under the 2015 NSPS is valid through January 24, 2028. This letter serves as your pellet heater Certificate of Compliance. Please refer to the above-referenced Certificate of Compliance number in all future correspondence.

Based on the above-referenced test report prepared by PFS-TECO demonstrating compliance with the American Society of Testing and Materials (ASTM) E2779, the EPA-approved Alternative Test Method (ATM) ALT-146³ and the information provided in your November 8, 2022, application, the above-referenced model is certified as meeting the 2015 NSPS. Under the 2015 NSPS and based on PFS-TECO's above-referenced Certification of Conformity, the model's emission rate of 0.98 g/hr meets the 2020 NSPS pellet heater particulate matter

¹ Revised on January 9, 2023.

² Revised on January 9, 2023.

³ February 4, 2022, letter from Steffan M. Johnson, Group Leader, Measurement Technology Group, Office of Air Quality Planning and Standards to John Steinert, Vice President, PFS-TECO approving an alternative to section 9.4.1.2 of American Society of Testing and Materials (ASTM) E2779-10. A copy of the letter can be found [here](#).

emissions limit of 2.0 g/hr. The heat output range and overall heating efficiency for the above-referenced model are 11,523 – 16,532 BTU/hr and 75%, respectively. This model line's carbon monoxide emission rate is 0.12 g/min.

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 January 24, 2028. Thereafter, you may not advertise for sale, offer for sale, or sell pellet heaters under this Certificate of Compliance without applying for and obtaining another Certificate of Compliance.

All pellet heaters manufactured or sold under this Certificate of Compliance must comply with EPA labeling requirements found at § 60.536. These provisions require each pellet 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 which ensures that all units within a model line are similar to the pellet 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 pellet heater model offered for sale;
4. Placing a copy of the non-Confidential Business Information (non-CBI) 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 pellet 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 revoking this Certificate of Compliance and enforcement action, including penalties as specified under the Clean Air Act. Pursuant to the EPA-approved ATM ALT-146, 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,

Elizabeth Vizard
Acting Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance
Office of Enforcement and Compliance Assurance