



OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

WASHINGTON, D.C. 20460

March 13, 2025

Mr. Luc Gilbert, Tech.
Engineering
Industrial Chimney Company Inc.
400 John-F Kennedy
St-Jerome, Qc, J7Y4B7
CANADA

Re: Update of the Certificate of Compliance Number 124-18 for the RSF OPEL PLUS Series: Opel+2C, Opel+3C, Opel+4C, and Opel+Keystone Catalytic Wood Heater Models – Adding Opel+Keystone-AK

Dear Mr. Gilbert:

The United States Environmental Protection Agency is in receipt of your September 10, 2024, letter requesting a new model designation be added to Certificate of Compliance Number 124-18. This Certificate of Compliance currently includes the Opel+2C, Opel+3C, Opel+4C, and Opel+Keystone catalytic wood heater models. Specifically, you are requesting that the Opel+Keystone-AK model be added to the above-referenced Certificate of Compliance. In your request letter, you confirm that this new model will be manufactured in the same way as the currently certified models, except for a higher log retainer. Additionally, you have affirmed that the modified log retainer with the Opel+Keystone-AK model will not affect the firebox volume nor emission results, thereby not causing any wood heaters within this model line to exceed the applicable emission limits.

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), 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 line (§§ 60.533(k)(1) and (k)(2)). However, the EPA may waive the requirement of recertification if the manufacturer presents adequate rationale, and the EPA determines that the change may not reasonably be anticipated to cause wood heaters in the model line to exceed the applicable emission limits.

Based on a March 5, 2018,¹ test report prepared by Services Polytests Inc. demonstrating compliance with ASTM International Test Methods E2780-10 and E2515-11 as well as the EPA Test Method 28R; a May 25, 2018,² Certification of Conformity by Underwriter Laboratories; and the information provided in your September 10, 2024, request letter, the EPA is approving the request for the new model designation to be added to the above-referenced Certificate of Compliance. The EPA has determined that the model line continues to meet the certification requirements in the 2015 NSPS at 40 CFR § 60.533. Please refer to the above-referenced Certificate of Compliance Number in all future correspondence.

Certificate of Compliance 124-18 continues to be valid through May 30, 2028, and no separate certification is required. This Certificate of Compliance is valid for the above-referenced models 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 models through May 30, 2028. Thereafter, you may not advertise for sale, offer for sale, or sell wood heaters under this Certificate of Compliance without applying for and obtaining another Certificate of Compliance.

All wood heaters manufactured or sold under this Certificate of Compliance must comply with EPA labeling requirements found at § 60.536. These provisions require each wood 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 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 the above-referenced models 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 wood heater model offered for sale;
4. Placing a copy of the full non-Confidential Business Information (non-CBI) certification test report and summary of the test report on the manufacturer's website and available

¹ Revised on May 4, 2021, March 6, 2023, and September 11, 2024.

² Revised on May 4, 2021, March 6, 2023 (revised by PFS-TECO to whom third-party certification was transferred), and September 12, 2024 (revised by PFS-TECO).

to the public within 30 days after the EPA issues a Certificate of Compliance, pursuant to § 60.533(b)(12). The up-to-date non-CBI certification test report and summary (if later revised) should remain posted on the manufacturer's website for as long as the model line is manufactured and offered for sale in the U.S.;

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 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 revoking this Certificate of Compliance and enforcement action, including penalties as specified under the Clean Air Act. To promote transparency in implementing the Wood Heater Program, we request that manufacturers submit a copy of the Uniform Resource Locator (URL) or web address where the non-CBI certification test report is posted to WoodHeaterReports@epa.gov within ten (10) days of posting.

Once we have verified that the revised test report has been posted on the manufacturer's website, the agency will add the Opel+ Keystone-AK model and continue to list the Opel+2C, Opel+3C, Opel+4C, and Opel+Keystone catalytic wood heater models in 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,

Loren Denton Ph.D.
Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance
Office of Enforcement and Compliance Assurance