



OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

WASHINGTON, D.C. 20460

November 24, 2023

Mr. Terry Krumrei
St. Croix Product Development
Johnson Gas Appliance Company
1155 Sherman Road
Hiawatha, Iowa 52233

Re: Element-P II Pellet Fuel Room Heater; Certificate of Compliance Number 340-23

Dear Mr. Krumrei:

I am pleased to inform Johnson Gas Appliance Company that the above-referenced model has been approved for certification pursuant to 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) by the United States Environmental Protection Agency (EPA). Certification under the 2015 NSPS is valid through November 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 an October 31, 2022¹ test report prepared by Intertek Testing Services NA, Inc. (Intertek) demonstrating compliance with the EPA-approved Alternative Test Method (ATM) ALT-146² and the American Society for Testing and Materials Test Methods E2515 and E2779 and the information provided in your December 15, 2022, application, the above-referenced model is certified as meeting the 2015 NSPS. Under the 2015 NSPS and based on Intertek's December 13, 2022,³ Certification of Conformity, the model's emission rate of 1.1 g/hr meets the 2020 NSPS particulate matter emissions limit of 2.0 g/hr. The heat output range and overall heating efficiency for the above-referenced model are 9,318 – 31,773 BTU/hr and 79%, respectively. This model line's carbon monoxide emission rate is 0.0047 g/min.

¹ Revised on December 12, 2022, and November 9, 2023.

² [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 ASTM E2779-10. A copy of the letter can be found at <https://www.epa.gov/system/files/documents/2022-02/alt-146.pdf>.

³ Revised on October 18, 2023, and November 10, 2023.

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 November 24, 2028. 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 pellet 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 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 United States;
5. Submitting a report to the EPA every two years following the 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).

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 the 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,

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