

REV supports the regulatory timeline language as proposed by DEC. REV recommends an alternative interim solution (preferred) or slight amendments to the DEC interim solution B.

*Alternative Interim Solution:*

(b) Until the rule amendment required under subsection (a) of this section is adopted, new advanced wood chip and wood pellet heating appliances with oxygen trim systems for use in institutional, commercial, or industrial applications with outputs <2,500,000 British Thermal Units per hour (BTUs/hr) shall be permitted as per U.S. Environmental Protection Agency Area Source Boiler rules 40 CFR Part 63, Subpart JJJJJ, unless such appliance has been certified by the U.S. Environmental Protection Agency as meeting the requirements of 40 C.F.R. Part 60, Subparts AAA and QQQQ as published in the Federal Register on March 16, 2015.

*Amendments to DEC Option B:*

(b) Until such time that a rule amendment as required in subsection (a) of this section is adopted, and notwithstanding §5-204 of Code of Vermont Rules 12-031-001, manufacturers of [new advanced](#) wood heating appliances for use in institutional, commercial or industrial applications shall be subject to a certification process conducted by the Agency of Natural Resources wherein each discrete model to be installed in Vermont shall be certified by the Air Pollution Control Officer before installation occurs, unless such appliance has been certified by the EPA as meeting the requirements of 40 C.F.R. Part 60, Subparts AAA and QQQQ as published in the Federal Register on March 16, 2015.

(1) Certification procedure: (A) The Secretary shall draft and finalize a certification procedure in accordance with this section [by July 10](#).

[\(i\) The certification process shall accept the European Standard EN 303-5 method and other similar test methods approved by the Air Pollution Control Officer.](#)

[\(ii\) The certification process shall not require an emissions level lower than 40 C.F.R. Part 60, Subparts AAA and QQQQ as published in the Federal Register on March 16, 2015.](#)

(B) A fee of \$1000 shall be due the Agency for each certification application that is submitted in accordance with the certification procedure.

(C) Certification of a particular unit model issued by the Air Pollution Control Officer is not subject to the procedures and requirements of 10 V.S.A. Chapter 170.