



OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

WASHINGTON, D.C. 20460

May 22, 2025

Ms. Line-Danielle Lachance
Marketing Director & Neuville General Manager
LS Bilodeau, Inc.
281 Route 108 Est
St-Éphrem-de-Beauce
Quebec G0M 1R0
Canada

Re: AirBilo Wood Burning Cordwood Forced Air Furnace Model; Certificate of Compliance
Number 25FAF-25

Dear Ms. Lachance:

I am pleased to inform LS Bilodeau Inc. (LS Bilodeau) that the above-referenced cordwood forced-air furnace 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 QQQQ (2015 NSPS) by the United States Environmental Protection Agency. Certification under the 2015 NSPS is valid through May 22, 2030. This letter serves as your cordwood forced air furnace model Certificate of Compliance. Please refer to the above-referenced Certificate of Compliance number in all future correspondence.

Based on a June 1, 2024, test report prepared by Services Polytests Inc. demonstrating compliance with the August 19, 2019, EPA-approved Alternative Test Method (ATM) ALT-134¹ and the ASTM International Test Method E2515, as well as the information provided in your April 18, 2025 application, the above-referenced model is certified as meeting the 2015 NSPS. Under the 2015 NSPS and based on the CSA Group's September 26, 2024, Certification of Conformity, the model's emission

¹ August 19, 2019, letter from Steffan M. Johnson, Group Leader, Measurement Technology Group, Office of Air Quality Planning and Standards to Sylvain Bilodeau, President, L.S. Bilodeau Inc., Steel Products Manufacturing, approving an alternative certification procedure to use the Canadian Standards Association (CSA) B415.1-10 test method's burn rate settings in lieu of the Method 28 WHH procedures.

rate of 0.11 lb/mmBtu² meets the 2020 NSPS particulate matter emissions limit of 0.15 lb/mmBtu for cordwood forced air furnaces. The heat output range and overall heating efficiency for the above-referenced model are 19,258 – 64,412 BTU/hr and 74%,³ respectively. This model line's carbon monoxide emission rate is 2.1 g/min⁴.

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 May 22, 2030. Thereafter, you may not advertise for sale, offer for sale, or sell forced-air furnaces under this Certificate of Compliance without applying for and obtaining another Certificate of Compliance.

All forced air furnaces manufactured or sold under this Certificate of Compliance must comply with EPA labeling requirements found at § 60.5478. These provisions require each forced air furnace 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 forced air furnace submitted for certification testing in all respects that would affect emissions and are in compliance with the applicable emission limit in § 60.5474, pursuant to § 60.5475(m);
2. Applying for recertification whenever any change is made to the above-referenced forced air furnace model that affects or is presumed to affect the particulate matter emission rate for the model line, pursuant to § 60.5475(k)(1);
3. Providing an owner's manual that includes the information listed in § 60.5478(f)(1) with each affected forced air furnace 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 § 60.5475(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/or offered for sale in the U.S.;

² Calculated as the average of the emission rates of the four category runs (0.086, 0.102, 0.120, and 0.144 lb/mmBTU output).

³ Calculated as the arithmetic average of the stack-loss efficiencies (using higher heating value (HHV)) of the four category runs (71.1%, 75.2%, 71.6%, and 76.5%).

⁴ Calculated as the arithmetic average of the carbon monoxide (CO) emission rates of the four category runs (2.085, 1.567, 2.329, and 2.252).

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 § 60.5475(k);
6. Retaining records and submitting reports as required at § 60.5479; and
7. Submitting forced air furnaces for audit testing if selected by the EPA under §§ 60.5475(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-134, you must also include your approval letter in the non-CBI 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.

Please note that the test report documenting the certification test upon which this Certificate of Compliance is issued notes that the individual emission burn rate for Category 2 (Test Run Number 4) is 0.144 lb/mmBtu. According to our [Certificate of Compliance Renewal Policy](#), when a certification report for a cordwood forced air furnace documents an emission value at or above 0.14 lb/mmBtu heat output for an individual burn rate, manufacturers should not expect to be granted a waiver from certification testing when applying for renewal. Therefore, if LS Bilodeau chooses to apply for renewal of this Certificate of Compliance prior to its expiration date of May 22, 2030, LS Bilodeau will be expected to conduct a retest of Category 2 (Test Run Number 4) using the original sealed test unit. To apply for a Certificate of Compliance renewal, the application would need to include a certification test report documenting a valid retest of the test run along with all required supporting documentation, including a valid Certification of Conformity.

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, PhD.
Director
Monitoring, Assistance, and Media Programs Division
Office of Compliance
Office of Enforcement and Compliance Assurance