San Bernardino Fireplace & Woodstove
2240 E. Highland Ave.
San Bernardino, CA 92404
909-862-1330

September 13, 2011

Re: Docket Number EERE-2011-BT-STD-0047
RIN 1904-AC56

Statement by Jonathan Harman

I personally have been selling and installing vented "match-lighted" gas log sets for 25 years. Currently I am manager for San Bernardino Fireplace & Wood Stove. We are a family owned business located in the City of San Bernardino, California since 1914. We stopped the sheet metal and heating & air part of the business in the early 1970's and switched to fireplaces, wood stoves, gas logs and related products. Gas logs make up 10% to 12% of our sales.

Our customers choose vented "match-lighted" gas log sets because they offer the realism of a wood fire without the mess and pollution of wood being burned in a fireplace. It is an inexpensive, quick, easy, operationally simple and visually pleasing alternative to burning wood.

Less than 1% of our sales ever included a piloted/remote ready system, not only due to the extra cost, $400 on average, these systems also needed extra room for installation which many times we did not have, our elderly customs could not light the pilot and the lack of reliability of these units resulted in extra service calls and unhappy customers.

As far as the Electronic Ignition Systems (EIS), we have sold less than 10 units from 2 different manufacturers. All but 1 resulted in several service calls with in a month's time, 1 in complete failure in a week. We had to buy them back and go to match light or replace it with a piloted system.

The South Coast Air Quality Management District (SCAQMD), which covers approximately 16.6 million people within their Southern California jurisdiction, has put a lot of money into their Healthy Hearth Program. This program funds a discount program that encourages homeowners to stop burning wood in their fireplace and install a gas log. Their new program for this year offers very aggressive discounts for the worse air quality areas in their jurisdiction and is geared towards low-income households. In conjunction with this program starting November 2011 there will be Mandatory NO WOOD BURNING days on the worse air quality days during the winter. Gas logs are being encouraged to circumvent these restrictions and improve our air quality.

There are several points that stand out as the most unreasonable requirements in your current regulations:

A 9,000 BTU gas log is laughable and is not even marketable. It completely ignores the aesthetic reasons that would appeal to consumer's desires. They will just burn wood instead.

Certifying to ANSI Z21.60 and requiring an Electronic Ignition System I estimate would drive the cost of a gas log from $300 - $500 to $800 - $1000, not to mention the increase in service calls due to the reliability issues I have already mentioned. This puts the simple vented "match-lighted" gas log set into an unaffordable realm for a majority of my customers. They will just burn wood instead. I believe this cost increase would also severely hamper the SCAQMD's Healthy Hearth program.

I am asking that you please reconsider your position for vented "match-lighted" gas log sets.

Your proposed regulations would wipe out 10% to 12% of our business. It would destroy the SCAQMD's Healthy Hearth Program, which in turn would impact our Air Quality since the gas log would cease being a viable option for the consumer; they will just burn wood instead! It would also put an entire industry out of business. In this economic climate and a high unemployment, is this a wise idea?

Please work with our industry. I am sure the HPBA would be more than happy to provide you contact information of all the gas log manufacturers. I am also sure that the gas log manufacturers would be happy to provide you all the information you need to make a more sound decision.

Thank you for you time and consideration.

I am providing my comments in regard to the Proposed Rule dated July 22, 2011 concerning Vented Gas Log Sets.