



EPA's Wood Heater Regulations

What's the Truth and What are Just Rumors

RUMOR

I'll be able to sell a product that was tested before 2015 and passed the Step 2 emissions requirements, even though the permanent label on the back says I can't sell the product after 2020.

FACT

No, if it doesn't have a label on the product saying you can sell it after 2020, you must sell that product before May 15, 2020.

RUMOR

HPBA is taking care of this sell-through issue. I'll be fine, I don't need to worry about selling all these Step 1 products by May 15, 2020.

FACT

HPBA is doing the best we can to get sell-through for all products affected by the EPA's NSPS. But the rulemaking process is moving very slowly and EPA didn't even propose sell-through for all products.

RUMOR

I can just give away a Step 1-certified product if I don't sell it before May 15, 2020.

FACT

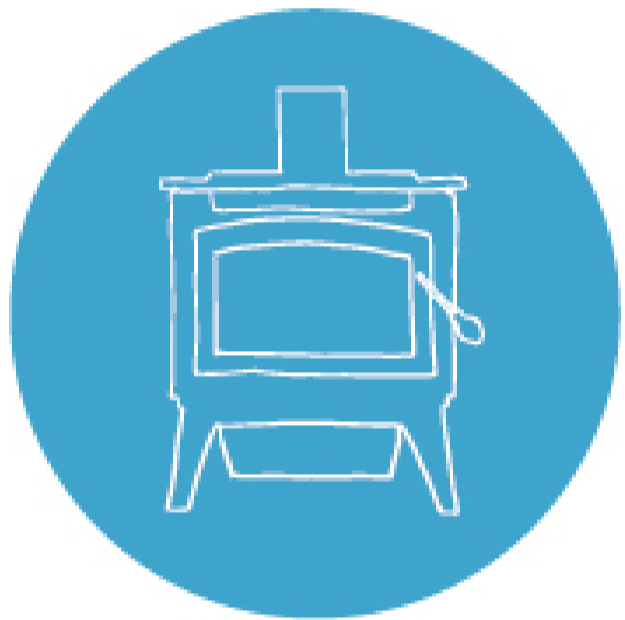
No, you can't. Transfer of ownership of a new affected product is not legal, even if no money is exchanged.

RUMOR

I can just get a new label from the manufacturer to put on the product I currently have. If the model was tested, unchanged, and passed Step 2, I should just be able to switch out the label for the correct one.

FACT

No, you cannot do this, and no manufacturer can do this.



RUMOR

If I burn the models in my store, I can sell them as used later, even if they don't meet Step 2.

FACT

No. EPA clearly defines a "used stove" as a stove that has a clear chain of **non-commercial** ownership. As a retailer, you are considered a commercial owner of the products in your store.

RUMOR

If I sell pellet stove models that are certified now, but used to be exempt, but it's the exact same model, I can still display the old version.

FACT

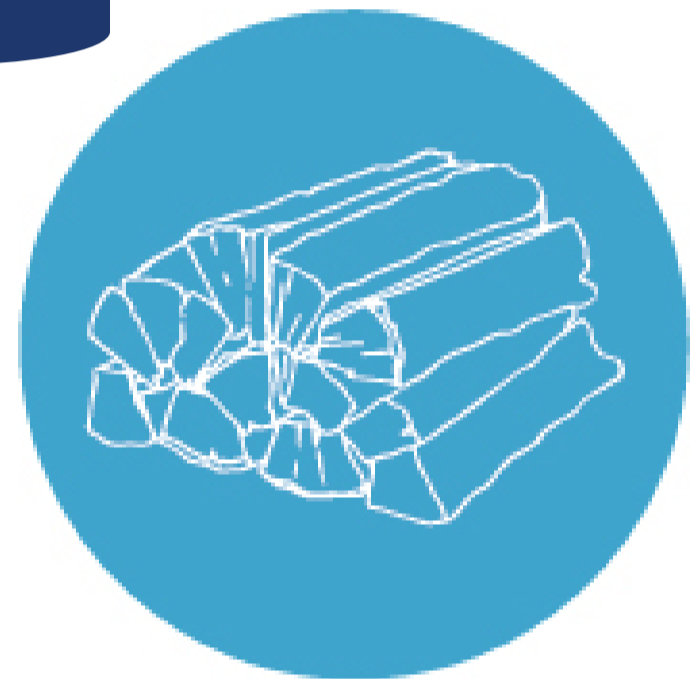
No that's what EPA is looking for in enforcement visits to retailers. You must sell these types of displays before May 15, 2020.

RUMOR

I live a long way from the interstate or any highly-populated area. My area is never going to see EPA enforcement make visits.

FACT

No, EPA enforcement has demonstrated that they will do enforcement anywhere, especially if you live near a national park or place of interest.



RUMOR

I don't have to have a floor model's manual "readily accessible to the consumer" in my store. That's such a trivial thing.

FACT

The NSPS states that a stove's manual must be "readily accessible to the consumer." It needs to be **physically near the stove**, either inside of it (if it isn't a burn model), next to it, in front of it, somewhere that it's apparent that it is the manual for that stove.

FOR MORE INFORMATION

Visit HPBA's website at
www.hpba.org/Advocacy/EPAs-NSPS