

To whom it may concern,

We are on the verge of a crisis and need relief.

The New Source Performance Standard (NSPS) set forth by the EPA to regulate the particulate of wood burning products to 2 grams per hour is commendable. It's clear that EPA wants clean air for everyone in our country and is fighting to make that happen. The problem is that with the way the NSPS currently sits, small businesses like mine will face disastrous economic effects along with the manufacturers of our industry and consumers who rely on our products to keep their families warm.

My name is Tim Reed and I live in Portland, Oregon in the beautiful Pacific Northwest. I'm the Retail Manager for Fireside Home Solutions where we employ 196 people throughout 6 locations in Portland, OR and Seattle, WA; in addition, I am the President of the Oregon Hearth, Patio and Barbecue Products Association (OHPBA) where I've worked at the county, state and federal level to improve air quality in my community for the last 14 years.

To outline the problems that we face, it first makes sense to back up and explain the context of our NSPS:

Burning wood for warmth and security has been a staple of humanity for as long as we have been on this planet, but there is particulate pollution as a bi-product of that warmth. A traditional campfire outside or an open wood-burning fireplace will put off upwards of 80 grams of particulate pollution every hour that the fire is going—*that is not good*. In the late 1980's EPA was able to begin putting a federal standard in place to regulate that particulate level to 7.5 grams per hour in wood burning stoves and similar products. *This was a huge win in reducing the amount of particulate pollution of our products and improving air quality nationwide!* In the mid 1990's, the state of Washington put a standard in place requiring wood stoves and similar products to be under 4.5 grams per hour (*nearly half of the national standard*). This was difficult for many manufacturers to comply with, and as a result, some products were able to be sold in Washington while others weren't. In 2015, the new NSPS was adopted with a two step approach to regulation: Step 1 made the Washington standard of 4.5 grams per hour a federal regulation and Step 2 (*which would be put in place in May of 2020*) would tighten that regulation to 2 grams per hour.

The heart behind the NSPS is terrific—*our industry wants regulation at the federal level and clean air for everyone*. In fact when we take into account the baseline, (wood burned in it's natural state puts off upwards of 80 grams per hour) Step 1 products at 4.5 grams per hour are over 93% cleaner than the baseline. *That is a huge improvement!* **A common misunderstanding is that Step 2 products (2 grams per hour) are twice as efficient as Step 1 (4.5 grams per hour), but when you compare it to the baseline, they are less than 5% more efficient.**

The problem with the current NSPS is that in May of 2020 *all* Step 1 products will be illegal to buy or sell. **These are the very products that are 93% cleaner than wood burned in it's natural state!** In my local county (Washington County, Oregon), we have seen firsthand how Step 1 products have improved air quality for the entire county. A few years ago Washington County was on the border of non-attainment for PM 2.5 levels. I worked with the State DEQ and my local County to help develop a wood stove change out program to remove uncertified stoves and replace them with Step 1 EPA certified products—*the results were incredible*. **We've seen the air quality in our county drastically improve and are not even close to EPA non-attainment any longer!**

The Step 2 requirement of NSPS at 2 grams per hour is attainable, but the problem is that while the announcement of the standard happened 4 years ago, the testing method that was to be used

wasn't solidified until the last 8 months. *Up to that point, manufacturers had no way of knowing how to develop their products to comply with Step 2 regulations.*

As it currently stands, the results of the NSPS Step 2 deadline (May of 2020) will be disastrous:

- **Small businesses like mine will be stranded with inventory that we can't sell** (*businesses in our industry generally buy products through an 'early buy' program one year in advance*)
- **Manufacturers are stuck with millions of dollars in dead inventory** (*because businesses like mine will not buy any more Step 1 products for fear of being stranded*)
- **Consumers who rely on wood to warm their families will face a skyrocketing cost of goods and extremely limited selection** (*many of these families are low income and do not have the means to heat their home another way*)

As an example of this, my business works with many low income families who heat their home with a cost effective wood stove called the "EcoChoice WS18" by Heatilator which has a retail price of \$1,299. As of today, the most cost effective Step 2 certified stove that we have access to is a the "Green Mountain 40" by Hearthstone which is priced at \$2,299. **A low income family simply cannot afford the extra \$1,000 for the Step 2 stove** (*which is only marginally more efficient than the Step 1 model*).

We are already seeing the effects of this. My company has not placed an early buy order for any wood burning products this year (*after ordering as much as \$350,000 in past years*).

The plan of NSPS is simple (and very good):

- 1. Adopt a tighter regulation standard**
- 2. Give the industry time to comply**
- 3. Provide cleaner air for everyone**

We need help with the second step—*there has simply not been adequate time for the industry to comply with regulation.*

I ask that you allow for a two year sell through of Step 1 products for manufacturers and small businesses like mine. These products are 93% cleaner than wood burned in it's natural state and the improvement in efficiency between Step 1 and Step 2 is less than 5%—*don't let such a marginal difference put thousands of American jobs on the line and low income families at risk by an arbitrary deadline.*

We have pursued the option of sell-through for the last four years with no relief—*this is our last resort.* Don't make the mistake of hurting the 196 families of my business (and our customers) by not allowing sell through of Step 1 products—*EPA is legally bound to take economic implications into account when enacting an NSPS.* We are not evading regulation, we welcome it, but need time to comply.

Please help us by allowing a two year sell through on Step 1 certified products.

You can be the champion of air quality for our country, protect American industry jobs, help low income families stay warm, and be an advocate for small businesses like mine. I know that you will do that right thing and work with our industry for the fair implementation of NSPS Step 2 so that we can bring clean air to everyone in our communities.

Sincerely,

Tim Reed

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