

BAR-2018-0195

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COMMENTS ON 2 YEAR SELL THRU ON AAA PRODUCTS

TO: EPA

FROM:

Dan Hechler

COMPANY:

Hechlers Hearth & Home

DATE:

12-27-2018

Dear EPA,

I would like to comment on the sell thru on the non compliant Wood burning and pellet stoves that will not meet the 2020 sell thru deadline.

At this date we still have in inventory 55 units that will have to be sold before the 2020 deadline.

If other dealer are like us and have a large inventory of currently approved, but not non 2020 certified units, at this point we will not be purchasing inventory from manufacturers that do not meet the deadline. This is going to adversely affect the manufacturer and will cause dealers to possibly dump inventory. Usually we place early buy orders that allow us extra discounts and the manufacturers plenty of time to build inventory and ship products. The factories depend on these orders to keep the factories running

2020 will adversely affect small business that operate on a seasonal basis. It is also very stressful to accomplish this. Our selling season is roughly September thru February. This could be a tall order to completely sell thru the inventory by deadline. Dumping will of

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course affect profit levels in turn tax revenue that goes to the government

I do not think there will be a shift to pellet heaters, the low cost of wood in our area will keep that from happening. Existing consumers will tend to hold onto their old stoves.

The time to sell thru the existing inventory of wood stoves can vary from season to season and styles of stoves that are popular vary from year to year.

I feel in the strongest terms that the industry needs at least a 2 year extension to flush thru and sell the existing inventory in the field. The inventory we are selling now is very good and clean burning. It is only going to be in my opinion, a very small increase in efficiency to move to the new 2020 standard and the current inventory is already very clean.

It would be best to create incentives to remove the older 20-30 year old stoves from the field to increase a better air quality. Remember when calculating numbers, these units are only used in the 3-4 cold winter months and sit idle in the spring, summer and early fall. Many are only used on weekends and evenings and not burning 24/7.

The hearth industry is a small industry nationwide and can not absorb burdensome regulation easily. The strong deadline and no sell thru is extremely hard on small business. I am also concerned that some of the smaller manufacturers will cease business and lay off their workers.

Small business cannot absorb the loss of \$50-100,00 of inventory that can not be sold. This would be a catastrophic loss to an independent dealer and some may not recover and cause a business failure.

Dan Hechler
Hechlers Hearth & Home
521 Main St. Troy Missouri

Dan Hechler

11-2-19