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Comments for the

EPA Public Hearing on Proposed Amendments to the NSPS for Residential Wood Heaters

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Ryan Carroll, Vice President – Government Affairs, Hearth, Patio & Barbecue Association

Good morning. I'm Ryan Carroll, Vice President of Government Affairs for the Hearth, Patio & Barbecue Association. I would like to thank EPA for continuing to look at the 2015 New Source Performance Standards for Residential Wood Heaters and for allowing us the opportunity to speak before you today.

The Hearth, Patio & Barbecue Association, or HPBA, is the principal national industry association representing manufacturers, retailers, distributors, and representatives for all types of hearth, barbecue, and patio appliances, fuels, and accessories. This includes solid fuel-fired home heating appliances, such as woodstoves, pellet stoves, hydronic heaters, and warm air furnaces, all of which are appliances covered by the 2015 NSPS.

HPBA is proud of our track record of working cooperatively with the EPA and the States on wood smoke issues of common concern for many years. This partnering started with the regulatory negotiations in the late 1980s that produced the original 1988 NSPS. Other partnership accomplishments include numerous woodstove change-out programs, resulting in remarkable improvements air quality in neighborhoods and homes. HPBA has also partnered with EPA in developing and implementing two innovative voluntary programs for hearth appliances: the voluntary program for hydronic heaters and a voluntary program for fireplaces.

In the November 30th Notice of Proposed Rulemaking, EPA proposed an additional two years of sell-through for currently certified hydronic heaters and warm air furnaces, or central heaters under Subpart QQQQ of the NSPS. This sell-through would allow products meeting the current NSPS requirements to be sold at retail until May 15, 2022. EPA is also inviting comment on a similar sell-through allowance for wood and pellet stoves, or room heaters covered by Subpart AAA. HPBA emphatically supports the granting of additional sell-through for QQQQ appliances. However, it is every bit as important that the same provisions be granted to AAA products.



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Both AAA and QQQQ products need an allowable sell-through period for the same reasons. First, without sell-through, most manufacturers will not have the benefit of the five-year lead time to develop multiple lines of Step 2-compliant products. That five-year period was an integral component of EPA's best system of emissions reduction determinations in the 2015 Rule and thus, EPA has rightly proposed to revise that Rule with an eye toward ensuring that manufacturers will indeed have the full five years.

Second, a two-year sell-through period helps ensure that manufacturers and retailers can recoup their investments in their Step 1 inventory on hand. The ability to continue selling Step 1 products until May 15, 2022 is a reasonable and necessary means of avoiding the significant economic harm that regulated entities stand to suffer if Step 1 products are stranded in commerce after May 2020. Importantly, it is through the revenue from sales of Step 1 appliances that manufactures have the resources to develop, test, and certify products to the Step 2 standards taking effect on May 15, 2020. If, as we are seeing across the industry, retailers are slowing or ceasing purchases of Step 1 products due to the looming retail prohibition on May 15, 2020, manufacturers ability to bring new, cleaner products to market – or even to remain in business at all – suffers dramatically.

HPBA strongly supports EPA's proposal to revise Subpart QQQQ to provide a two-year sell through period for hydronic heaters and forced-air furnaces. HPBA urges EPA to revise Subpart AAA to provide the same two-year sell-through period for wood and pellet stoves.

A two-year sell-through period is identical to what EPA included in the original 1988 NSPS when it allowed for the continued sale of previously unregulated wood stoves, appliances which EPA estimated to emit 60 to 70 g/hr of particulate matter. A two-year sell-through period for Step 1 wood stoves certified at 4.5 g/hr or less would have a dramatically lower environmental impact than what EPA allowed back in 1988. Similarly, in 2015, EPA allowed for the sale of previously unregulated hydronic heaters until the end of 2015. By comparison, a two-year sell-through period for Step 1 hydronic heaters (which, by EPA's estimate, are 90% cleaner than conventional hydronic heaters) would have far lesser environmental impacts than what EPA allowed in 2015.

Allowing two years of sell-through for appliances which are already dramatically cleaner than they were just a few years ago will help to ensure that a robust offering of better performing products, in a range of heating capacities, appearances, and prices, technologies, and fuel types are available. Being able to offer a range of products is important from manufacturers to retailers. But it is arguably most important as consumers look to purchase clean, reliable wood heaters, frequently to replace appliances that are far less efficient with emissions many times higher than any of today's offerings.



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I thank you again for allowing us to appear before you today and we look forward to continuing to engage with the Agency throughout this process.