



1901 NORTH MOORE STREET, SUITE 600
ARLINGTON, VA 22209 USA
P: (703) 522-0086 • F: (703) 522-0548
hpbamail@hpba.org • www.hpba.org

Comments for the

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

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John Crouch, Director – Public Affairs, Hearth, Patio & Barbecue Association

Good morning. I am John Crouch, Director of Public Affairs for the HPBA, and a former retailer in this industry. I am based near Sacramento, California, and advocate for effective woodstove changeout programs throughout the U.S. and Canada. Thank you for the opportunity to speak today about these important issues.

There are two issues I'd like address today; the first one is the impact of sell-through on consumers and the second one is the potential impact on the environment. Principally I'm going to talk about the need for sell-through for woodstoves, but all of this applies to QQQQ products as well.

The first issue echoes remarks I made at the public hearing in Boston in 2014. I stated that the EPA was not adequately addressing the potential cost impacts of the difference between the step 1 and step 2 stoves. At that time, the cost impacts were somewhat speculative; but now we have data.

First, we need to understand that most step 1 stoves have already been certified in the 2.5 to 3.5 g/h range, and some as low as 2.1. This was the best manufacturers could do in those models with those emission control systems. Moving to below 2 g/h does not add much to their performance in the laboratory. It is not, however, a trivial move from an emission design standpoint. With some exceptions, most manufacturers must add a catalytic converter into the unit, with the attendant costs of the catalyst and its bypass system.

Let's take a real-world example of the impact of this change in design with prices from my local dealer for a popular mid-size stove. The model F2400 is a non-cat, and its step 2 version, a model CI2600 that is equipped with a new 'hybrid catalytic system.' Both were tested to the traditional crib method. The difference in their laboratory emissions is 1.6 g/h, but the difference in the cost to the homeowner is just over \$1,000. For that additional



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\$1,000, we move from a simple to operate, rock solid model with a proven track record, to a new system (for that company) which is more complicated to operate and with no track record as to longevity. We don't know if the new model will be cleaner in the real world than the old model over time, or even initially. If not, the \$1,000 increase in price may buy us nothing.

We do have some historical data from EPA's own in-home emission testing in the 1990's and it makes clear that the laboratory test method we are mandated to use fails to predict real world performance. In fact, in some cases, mid-level emission stoves when placed in homes outperformed lower emission laboratory stoves, perhaps because they were simpler to understand and operate? We just don't know if consumers or the environment will see ANY of this 1.6 g/h improvement in the laboratory performance of this new model.

What is the impact of a sell-through on the environment? I'm certain you'll receive comments that granting sell-through will cause some specific increase in morbidity, or asthma, or even mortality! These assertions are, of course, based on modeling of laboratory results, not real-world numbers, and typically advanced by less knowledgeable folks who think that the laboratory results mean much more than they actually do. The EPA-sponsored, in-situ studies make clear that there is no correlation between lab results, at these very low limits and real-world emissions. Consequently, there is just no evidence of any harm in letting step 1 stoves be sold until at least May 15, 2022.

This increase in costs may buy us nothing and may produce no benefit for the environment. I understand that the emission limits for woodstoves are not in question here. This is true, but surely it is our goal to deliver demonstrated real-world reductions, products that truly reduce woodsmoke, and in a cost-effective manner. The manufacturers need the final two years of this step 1 period to finish developing these stoves, to finish finding ways to make them less expensive, and to be certain that the new models really work. Can they be successfully operated by consumers, and will they hold up for the 20 plus years they should last?

Currently, the retail stove dealers are terrified of the rigged May 15, 2020 cut-off in the original rule. Our business is very dependent on the weather, and we may or may not have enough cold weather everywhere in the country for all dealers to move their remaining step 1 stoves by that deadline. The net effect of that is that the system has seized up. Dealers are frantically clearing out every stove they can and trying to move to stocking only step 2



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models. These are mostly pellet units or new units which may be certified but not yet even in production as manufacturers must first move their already built inventory out before they dare start making step 2 units. Either way, they are not ordering many step 1 stoves.

When the 2015 rule was promulgated, manufacturers knew it would be a tough deadline to meet and suspected that the lack of a step 1 sell-through provision would be problematic. Now we are certain we have a problem, as the net effect has been 3 years to prepare, not 5. There is also no in-situ evidence that a 2-year see-through will cost our airsheds anything. While this is primarily true for woodstoves, this is equally true for QQQQ products, where we have even less evidence that the new lower, targets deliver real improvements. This NSPS may last for many years and a 2-year sell-through now will enable us to generate better performing units that tend to cost less and be better for the environment for a long time.