



# **BOWMAN'S STOVE & PATIO**

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December 22, 2018

US Environmental Protection Agency  
EPA Docket Center, Docket ID. No. EPA-HQ-OAR-2018-0195  
Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington DC 20460

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Here's answers to the questions the EPA has requested answers to:

1. As a retailer, are you declining to purchase from your manufacturers, Step 1 complaint wood heaters that cannot be sold after May 15, 2020 and how widespread is this practice?

**Answer:**

Yes, I am declining to purchase any more step 1 compliant wood heaters for my inventory. I believe most other retailers are doing the same. I worry about not being able to sell them in time before the current May 15, 2020 deadline.

2. Has there been a shift to pellet heaters as opposed to cord wood heaters as a result of the pending deadline? Do you think this will become more significant as the May 15, 2020 deadline approaches?

**Answer:**

No, there has not been a shift to pellet heaters. Pellet heater sales have been declining for years. We barely sell any at all. I don't foresee pellet heater sales increasing in the future. Pellet heaters are complex, unreliable and usually cost customers more to heat with compared to wood or natural gas/propane heaters.

3. When is it likely, as a retailer, you will no longer purchase Step 1 heaters (those that may not be sold after May 15, 2020)?

**Answer:**

Since March of 2018, we have decided not to purchase any more step 1 heaters to keep in our inventory. We only order step 1 heaters if a customer places an order for one. We are discounting and selling off most of our display model Step 1 heaters.

4. EPA is also asking you to comment on the time frame from the date you purchase a wood heater, until the time it is sold to a consumer?

**Answer:**

We sell most heaters within two years of purchasing them, but some unique/low volume wood heaters can take up to four years to sell.

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5. EPA is also soliciting your comments on whether a sell-through period for Step 1 heaters is a reasonable way to address those concerns of retailers' reluctance to purchase Step 1 compliant wood heaters?

**Answer:**

Yes, a sell-through period is a reasonable way to make retailers comfortable with purchasing Step 1 heaters. The sell-through period must be for all wood heaters, not just hydronic heaters and forced-air furnaces. We don't sell furnaces or hydronic heaters. We only sell smaller free-standing wood burning stoves, wood fireplace inserts and wood fireplaces.

6. What time period will be necessary for you to sell off your Step 1 complaint heaters?

**Answer:**

An additional 3 year sell through period after May 15, 2020 would be necessary to sell off my inventory of step 1 compliant heaters. I have 17 different step 1 compliant heaters on display, with an additional 17 in inventory. That's a total of 34 step 1 heaters that I need to sell. Many of these are unique and slower selling models, so it would probably be impossible to sell them all before May 15, 2020. I worry that I will have many stoves leftover that I cannot sell after May 15, 2020.

Sincerely,

Dustin Bowman  
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