



January 11, 2019

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OAR-2018-0195, EPA-HQ-OAR-2018-0195-0001

Re: comments 2015 NSPS, 40 CFR part 60, subpart AAA sell-through period

Dear Administrator,

Fireplace Products International Ltd. appreciates the opportunity from EPA to allow us to comment on the sell-through period of two years for retailers.

FPI is a medium sized company that has been certifying and manufacturing EPA products for over 30 years. We have gone through the initial 1988 NSPS introduction and now are in midst of working through the new 2015 NSPS. We have invested heavily on equipment and manpower to enable us the chance to have our line up ready to meet the May 2020 deadlines.

The largest hurdle we are facing is the new 2015 NSPS Step 2 May 15, 2020 deadline did not acknowledge the need for a sell – through provision to help move step 1 products through from manufacture- distribution- dealer to the end consumer. This detail has created issues with sales, plans, and large amounts of inventory throughout the US. Currently without a sell-through provision, retailers are concerned with having inventory that is not step 2 compliant and therefore not interested in purchasing any step 1 product along with looking to sell off display and existing inventories. These actions are going to negatively affect manufactures production and sales for the next two years which will lead to less investment capital and layoffs.

We believe EPA has acknowledged the importance of a sell – through period hence the opportunity to comment. We are requesting that EPA sincerely consider at minimum a two year sell-period to allow the entire commerce stream to flush out Step 1 inventory and be replaced with new step 2 certified inventories. This cannot be done without a sell – through period.

Sincerely,

Dave Lal
Research and Product Development Eng.