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**From:** Pablo Fleischmann <geosolarstore@gmail.com>  
**Sent:** Monday, January 14, 2019 2:38 PM  
**To:** A-AND-R-DOCKET  
**Subject:** "Docket ID No. EPA-HQ-OAR-2018-0195"

Green Energy Options/GEO Solar Store  
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January 14, 2019

Andrew Wheeler  
Acting Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2018-0195  
Proposed rule amending the 2015 Residential Wood Heater New Source Performance Standards (NSPS)

Dear Mr. Wheeler,

**Green Energy Options** (my business) supports the EPA's proposed rule to amend the 2015 Residential Wood Heater New Source Performance Standards (NSPS) to add a two-year sell-through period and asks the EPA to extend the proposal to include all residential wood heaters subject to Step 2 requirements, including wood stoves and inserts. A two-year sell-through period allowing the sale of all Step 1 compliant devices remaining in inventory would be enormously valuable to our business, our customers, the manufacturers, and the environment. Technical, developmental, and business considerations justify this additional sell-through period.

We have great concern that the selection of wood burning appliances available to our customers will be abruptly and substantially reduced without the additional sell-through period, and with many of the remaining available units being those of the traditional catalytic design. Non-catalytic stoves are clearly the preference of our customers because of their ease of operation and durability, minimal draft sensitivity, and lower purchase and installation costs. Also, non-catalytic stoves pose fewer safety risks, as found by chimney sweeps who work with all kinds of wood stoves. Those stoves are simpler, the designs are more reliable in the long run, and they require far fewer field service calls than catalytic stoves.

For innovative designs to meet the more restrictive Step 2 NSPS limits, the full research and development process including design engineering, foundry and tooling, prototypes, in-house development testing, refinements, production, EPA certification, and safety certifications, takes years to complete. The granting of a two-year sell-through period for Step 1 compliant models would allow us time to sell the stoves that we have in our current inventory. Also, until a wide

range of new and innovative wood-burning stoves and inserts are available to our customers we need to have product to sell to remain a viable business.

We ask the EPA to extend the two-year sell-through period after the NSPS Step 2 compliance date for Step 1 compliant units, as described in the proposed rulemaking, to include all residential wood heaters subject to Step 2 requirements, including wood stoves and inserts.

Sincerely,

Pablo Fleischmann  
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