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Sent: Monday, January 14, 2019 3:28 PM
To: A-AND-R-DOCKET
Subject: Docket ID No. EPA-HQ-OAR-2018-0195

To whom it may concern,

First I would like to say that the NSPS 2020 emissions level is too low at 2.0 grams per hour. This was bad science on the part of the EPA. When the 2015 standard became law, I only had 1 product in my entire woodburning lineup that didn't meet that emission level. As of this point, out of the 58 woodburning products I have on my showroom floor, only 5 of them meet the 2020 standard.

I am worried about the EPA proposed 2020 change causing a severe financial hardship to my business, to the point it may put me out of business after 30 years in the specialty hearth business. For me, I ONLY sell hearth products, it is not a sideline for me. I don't sell hardware or barbecues or hot tubs. Over 50% of my sales are woodburning products, not gas, and the lack of a sell through period is going to be a huge hardship for me. My market area is much more rural and has a lot of woodburning.

I typically sell over 80 woodburning products a year, and most of these are in the fall and early winter. With the lack of sell through cutoff happening in May of 2020, we will have to make sure we are selling off our woodburning products in the winter months of late 2019 and early 2020. Because we have so many stoves in our showroom and we try to keep "one to show, one to go" we have over 100 products in stock at one time. This is spread out over seven different manufacturers, not one of which has certified more than a fraction of their woodburning lineup to the 2020 standard. Out of this more than 100 products, less than 10% of them are 2020 certified units. If a manufacturer even has 20% of their woodburning products 2020 certified, this would be on the high side. In fact, what we are seeing is the manufacturer's are just dropping their woodburning products all together instead of trying to certify to 2020. One manufacture discontinued making all of their woodburning, others are dropping portions of their lineup. This lack of competition in the marketplace is going to drive up the cost of the products, which will hurt consumers spending ability.

We are already cutting back severely on the number of products we are keeping in stock, as so few of the products are 2020 certified, and since we only have one more full season to sell the products, we don't want to get to the May 2020 cutoff (without any sell through) and have products we have to sell at a severe discount or even below cost to get rid of. This is going to be a financial hardship, as we have such slim margins in the hearth industry anyway, and if we are selling and installing products at a reduced or at cost level, just to get rid of product because of the lack of sell through time frame, we will have a very bad year financially. I am sure the lack of step 1 2015 certified products being purchased by my business and other's like me is already affecting the manufacturer's business. Because I am not ordering the same numbers of 2015 products because of the lack of the sell through period, my manufacturer's income is down, which is giving them less funds to develop the step 2 2020 products. Its a vicious cycle, all because of the lack of a sell through period. I wonder if the lack of this sell through period was a deliberate ploy to kill off the woodburning industry, because it makes no sense to anyone that understands how the economy works.

The consumers that I serve have a wide variety of tastes when it comes to the size, look, style and type of woodburning products that I have to offer. With the reduced inventory I have the choice to order in 2020 certified product, and the reduced amount of 2015 product that I am already stocking, the choices I have to offer my customers are being restricted. If we had a sell through period available for the 2015 product, I would be able to gradually sell off my 2015 certified product from May of 2020 to 2022, instead of having to make sure all of the product was gone by 2020 when there is insufficient product to replace it with that is 2020 certified.

I think it is extremely important that we have a minimum of a 2 year sell through on the products meeting the 2015 standard, after May of 2020. With this 2 year sell through, it will allow us small retailers more time to plan and not have to sell our existing products off at fire sale prices (no pun intended) because of the lack of step 2 2020 products on the market. It's still going to be very expensive to the marketplace to meet the unreasonable 2 gph standard, but the additional time to get rid of products in stock at dealers around the country is critical to not driving hundreds of small businesses under, because of the financial hardship. My business is providing a living for 4 different families and providing a service to a few hundred thousand people in our service territory of a 100 mile radius around Laramie, WY. There is already a lack of trained service personnel in my very rural area of Wyoming and northern Colorado, so if this new 2020 standard puts me out of business, it will be even worse. The 2 year sell through is critical so that I don't have to deliberately decrease my inventory levels, just because of the lack of the 2020 available products. This lack of inventory is going to hurt my customer's selection ability, hurt my business because of the sales I am going to miss out on, hurt my distributor's who won't stock product, and hurt my manufacturer's who can't get the new products developed and into production soon enough.

It is absolutely critical that you delay the sell cutoff point of existing 2015 step one products until at least 2022 so that we have time to sell through. This is a very seasonal industry and if we haven't sold something by the end of February, it's probably not selling until later that fall in September. Two additional seasons are critical to the continued success of my business and my industry.

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