

01.11.2019

To:

Environmental Protection Agency
EPA-HQ-OAR-2018-0195-0001

Dear EPA,

I support EPA's Proposal of adding a sell-through provision to 40 C.F.R Part 60, Subpart QQQQ to allow residential hydronic heaters and forced-air furnaces that meet the 2015 (Step 1) standards to be sold until May 14, 2022, so long as those appliances were manufactured by May 15, 2020.

This sell-through provision is very important to my small business as a dealer for residential hydronic heaters for the following reasons.

It is not uncommon in this industry to carry over inventory for two to three years due to the wide variety of sizes and colors and the unpredictability of what our customer may need. When stocking inventory lead times have to be factored in from production to trucking schedules. These long lead times are a part of planning our inventory so we have adequate supply to keep generating revenue.

Currently 2020 compliant hydronic heaters are not available to my dealership. To eliminate our financial risk the time has already passed where we should have been ordering and carrying products that were 2020 compliant. I already have inventory that I will not be able to sell by the 2020 deadline.

We are neither in a financial position where we can afford to run out of inventory and stall our business nor in the position to be stranded with inventory we cannot sell. We already have been adversely affected financially from a decrease in sales due to cost increases of the Step 1 hydronic heaters. The majority of my customers are purchasing a hydronic heater to save money on their heating bills and they typically have a low household income. The increased costs have narrowed our customer base that can afford to purchase this product. We cannot afford to suffer the additional financial losses that we will incur with not having a sell-through provision.

Without a sell-through provision the financial effects would be devastating to my small business. A two-year sell through provision would allow me to continue to generate the income needed to support my business and reduce the risk that I will be left with the financial burden of inventory I cannot sell.

Thank you,
Stephen Bradley
Owner

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