

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,

Tall Pines Farm Inc. 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, our manufacturers, and the environment. Technical, developmental, and business considerations justify this additional sell-through period.

It is not uncommon in our industry to carry over inventory for two to three years due to the seasonal nature of our demand and the small scale of most of our manufacturers. We need to purchase in the off-season and concentrate on selling during the three months when we sell fifty percent of our products. Because of great fluctuations in demand due to comparison of our products operating cost vs. fossil fuel costs, we often carry some products more than three years.

We are not in a financial position to run out of inventory and stall our business nor are we in a position to be left with stoves in our inventory that we cannot sell. We understand and support the improvement of efficiency of new products. Without a sell through provision the financial effects on my small business will be devastating.

We also 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. Tall Pines Farm Inc. prefers selling non-catalytic stoves because installation is simpler, the designs are reliable, and they require far fewer field service calls than catalytic stoves because of operational or mechanical issues.

The range of choice for our customers will be drastically reduced. Also, it is uncertain whether manufacturers of the remaining choices will be able to meet customer demand nationwide for the number of units able to be produced. We consider that with fewer choices and higher retail cost home owners will be discouraged from buying a new cleaner burning stove, which would not only hurt our business, but would also result in the continued use of older and more polluting wood

stoves. Our marketing area encompasses mostly rural areas of Pennsylvania and New York. Many of our customers who purchase wood burning stoves and inserts do so to save money. A great number have a wood stove and are looking to replace an inefficient 1970's or 80's stove. Pricing them out of the new market will push them into buying a used stove or keeping their old stove.

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 preferred by our customers until innovative and improved models are widely available to satisfy market demand.

The wood heater NSPS was originally intended to drive technological innovation resulting in reduced emissions and improved air quality. While some traditional catalytic wood heaters on the market today might meet the Step 2 certification requirements in initial testing under ideal conditions, they will not necessarily continue to meet Step 2 standards in ongoing use or result in improved air quality over a lifetime of real-world, in-home use. New technologies will emerge as the result of regulation with technology that will surpass Step 2 emission limits while maintaining the ease of operation that consumers demand through the lifecycle of the stove. 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,

George W. Conner Jr.
President
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