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To whom it may concern,

This letter serves as a commentary on the looming 2020 deadline on the sell through of existing EPA certified solid fuel home heating appliances.

Over the last three decades being in the hearth business I have worked closely with the San Joaquin Valley Air Pollution Control District to combine the efforts of local wood stove retailers and the Air District to combat PM 2.5 emissions in the Central Valley of Northern California. Together we have achieved great results in the reduction of emissions with a changeout program and consumer education, getting rid of old, gross polluters and converting open hearth fireplaces into much more emission-friendly environments.

We have been in business since 1986 and currently have two retail locations, one in Stockton Ca., the other in Modesto Ca. We are a small business employing 10-12 full time employees. Our sales of solid fuel products (EPA certified wood and pellet stoves) are:

2016 - 58

2017 - 38

2018 - 32

Over the last several years working with the local Air District, the increase in “no-burn days” by reducing the AQI index and public education by the District and the retailers has achieved quantifiable results in the reduction of PM 2.5 and fewer solid fuel hearth products being sold. This year we, the retailers, will be working with the Air District to continue to reduce the AQI levels which will, in turn, further reduce wood and pellet stove sales. The projection for 2019 for our wood and pellet stove sales is anticipated at 20 units, +/-.

We currently have 36 wood and pellet stoves on display and in stock, none of which meet the 2020 NSPS deadline. With the projection of maybe 20 or so units being sold in the coming year, we know we will be left with inventory that we cannot sell. All hearth retailers are essentially “mom & pop” businesses. We have a variety of different hearth products on display to meet the different needs of consumers. At best, if we are not granted an extension on sell-through of our products like the residential hydronic heaters and new forced air furnaces have been given we will be forced to make a choice: we will either have to dispose of brand new, efficient heaters, or break the law by selling them on the black market. Neither of these are choices we want to make.

What makes it difficult is the fact that manufacturers, distributors and retailers of hearth products have worked diligently with the EPA and local Air Districts to accomplish a common goal, that of reducing the number of wood and pellet stoves sold, reducing the emissions in the air shed, and closing the gap of compliance. But retailers are vulnerable to a huge financial downfall if we are not allowed the same consideration as other businesses in being granted an extended sell-through period. It’s a simple matter of fairness. We have made great strides to partner with government agencies to achieve the overall

reductions in emissions that we have with highly efficient, clean burning products. And, while we agree that the new standards are important, we also have the reality of everyday life, that of maintaining our fiscal viability in order to continue to provide alternative solutions to home heating.

As you can see from the numbers below, our collective efforts in the CentralValley have proven results. These are just the numbers from our own Valley, but industry trends reflect the same percentages.

	SOLID FUEL APPLIANCE SALES	GAS AND ELECTRIC SALES
2005-2013 (Avg cumulated)	41%-46%	54%-59%
2014	39%	41%
2015	36%	44%
2016	36%	64%
2017	28%	72%
2018	22%	78%

At the retail level, we encourage consumers to purchase electric or gas appliances. It's better for them, better for us, and obviously better for the environment. But the fact remains that there is still a segment of the market which prefers solid fuel. Most of these consumers of solid fuel products are making their decision due to family budget constraints. These are poor people who either cannot afford the high price of electric or propane bills, or have no other source of heating their homes. This is why we have a "low-income" portion to our local grant program.

The EPA allowing an extension of sell-through of Step 1 products until May of 2022 2 things will happen:

1. Retailers and distributors will be able to stay viable by flushing out remaining products in inventory.
2. As we wind down our inventories we will be able to bring in Step 2 products to meet the demands of the marketplace in a reasonable manner.

Not discounting the efficacy of the NSPS, the diminutive impact our current inventory will have on the overall PM 2.5 inventory in the airshed is a fraction of a percentage. But the hardship of the financial impact on our businesses could be monumental. For my business, and others in our industry I have spoken with, the impact could be crippling to a degree. We are not a large industry and, as such, we do not have the lobbying power and voice that other industries have. We have diligently worked with government to achieve this common goal of emission reductions over the last decade, and we are making great strides to greatly reduce the sale of solid fuel products. But, with the NSPS step 1 deadline approaching, we are feeling the looming prospect of being "stuck" with White Elephant inventory, or worse.

I realize that, as an industry, we are a small fish in a big pond. And, as concerns my own business, I am an even smaller fish in a bigger pond. My hope is that this message will not fall on deaf ears, that the human element of what this could mean will resonate with decision-makers. We willingly participate in the goal of compliance with the Clean Air Act and emissions control. We are not entitlement minded; we simply want to be afforded the same opportunity that others have been given.

We have several different products for different applications and different consumer needs; wood and pellet inserts and freestanding stoves in a variety of sizes and styles. With the variety we need to have to bring to the market, each unit becomes, in essence, a niche product. Finding that one customer who

wants and needs a specific stove or insert can take time in order to sell off the remaining inventory. This poses a challenge, and a hardship if we are held to the May 2020 deadline.

My wife and I started this business in 1986, and we have struggled through recessions, economic meltdowns, and the ups and downs of the market. From a 30,000 foot view, selling through remaining product at the retail level may not seem like a great hardship, especially to those who are only able to understand the intricacies vicariously. We desire to continue to comply with the law, and not sell improperly labeled solid fuel devices past the deadline, but we are faced with having to choose from the lesser of two evils. And while 30+ stoves and inserts may not seem like a lot to have to sell through, because of the low volume of solid fuel products we now sell, combined with the uniqueness of each product, we feel we are in an untenable situation before the 2020 deadline. The anticipation of being in a situation where saleable inventory becomes white elephant inventory that will become worthless at a point in time, and with delays in getting compliant product to replace what we sell, we are worried about the overall viability of our business in the future.

The EPA has within its power to remedy this situation with the stroke of a pen. My hope is that this letter does not sit on a pile of paperwork, never to be read or heard by those who have the power to make a decision that will ultimately have an impact on my business, and my life. Based on what the final decision might be, we will either be forced to make a business decision that could have a detrimental impact on our business, our employees, and ultimately all of the families who are by default part of this industry. To those who have the final say in what the final outcome will be, I as a husband, a father, a businessman, and a part of our community implore you to make a decision that, in the grand scope of things, will have almost zero impact on the intended outcome, that of reducing overall emissions.

Thank you for your consideration in considering one person's efforts to explain the plight we face with the May of 2020 deadline. We look forward to a continued partnership with Air Districts and regulatory agencies to achieve the ultimate in emissions reductions.

Sincerely,

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