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US Environmental Protection Agency

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1200 Pennsylvania Avenue NW

Washington DC 20460

To Whom It May Concern:

My name is Barry Charbonneau and I'm the owner of the Woodstove Fireplace and Patio Shop in Littleton, Massachusetts. I'm writing concerning the EPA's proposed Step 1 compliance rollout. My understanding is that the EPA would like me to address specific questions about how this regulation will impact retailers like myself. These questions were given to me from an Chris Neufeld from Blaze King Industries.

- 1) As a retailer, are you declining to purchase from your manufacturers, Step 1 complaint wood heaters that cannot be sold after May 15, 2020 and how widespread is this practice? Yes, we're not stocking or displaying any units that do not meet the requirements. However, we are ordering and selling on a sale by sale basis.
- 2) Has there been a shift to pellet heaters as opposed to cord wood heaters as a result of the pending deadline? No. Do you think this will become more significant as the May 15, 2020 deadline approaches? There may be a small shift but it will depend on availability of models meeting the requirements. Most wood stove seeking customer will not move to pellet models however.
- 3) When is it likely, as a retailer, you will no longer purchase Step 1 heaters (those that may not be sold after May 15, 2020)? Likely in November of 2019
- 4) EPA is also asking you to comment on the time frame from the date you purchase a wood heater, until the time it is sold to a consumer? It can take a few years for units bought on a pre-buy basis. We're not pre-buying units due to the uncertainty of the timing of this regulation. This hurts us financially as we're not able to take advantage of discount pricing. We currently order units as customers place their orders. It can take several months from the time they purchase until the time they are installed during the peak season.
- 5) EPA is also soliciting your comments on whether a sell-through period for Step 1 heaters is a reasonable way to address those concerns of retailers' reluctance to purchase Step 1 compliant wood heaters? A sell-through period is absolutely essential for us to stay in business. There are not enough step 1 compliant units available. I currently have 35 display units on my sales floor. Only 4 of them are step 1 compliant. I have another 15 non-compliant units in my warehouse. If a reasonable sell-through period is not allowed I will have only 5-10 units to display in my showroom by next fall. My showroom will look like I'm going out of business, which is what may happen if there is not a sell-through period. In addition to the lack of display units, I will be

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forced to sell my current non-compliant units at, near, or below costs to get rid of them before the deadline. I'll be competing with all the other hearth stores who will also be faced with the same issue.

- 6) What time period will be necessary for you to sell off your Step 1 complaint heaters? This depends on how quickly manufacturers bring compliant heaters to market. Currently, our manufacturers have only a handful of compliant heaters. I suggest setting separate manufacturing deadline and selling deadlines. Retailers should be given two years after the manufacturing deadline to sell through their non-compliant inventory. This will avoid flooding the market.

I feel that the rollout of this regulation is critical to the survival of hearth shops across the nation. Most hearth shops are small, family owned operations. The financial burden of swapping out our existing displays will be challenging. If the deadline is not extended and a reasonable sell-through period is not included in this regulation we will be faced with a greater burden of selling inventory at or below cost. In addition, we may have units we can't sell before the deadline causing us to absorb the cost of this lost inventory. I urge you to seriously consider how this regulation is being rolled out from the perspective of small family owned retail shops. It will put many of us out of business as currently written.

Respectfully,



Barry Charbonneau

Owner

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