

**Proposed Amendments to the 2015 Standards of Performance for New Residential Wood Heaters, Hydronic Heaters and Forced-Air Furnaces
EPA Public Hearing**

June 8, 2020

**Written Comments from John Crouch, Director – Public Affairs
Hearth, Patio & Barbecue Association**

I am John Crouch, Director of Public Affairs for the Hearth, Patio, and BBQ Association, (HPBA). I would like to add some additional comments to those of our Vice President, Mr. Ryan Carroll.

By way of background, I have for the last 32 years worked on, advised, and organized woodstove changeout programs in the U.S. and in Canada. I did that as a retailer and later as an employee of HPBA. On behalf of the industry, I have worked and partnered with the EPA, several chapters of the American Lung Association, and virtually all of the western states with fine particulate matter issues related to woodsmoke, including Oregon, Washington, Alaska, Colorado, Idaho, Montana, Utah, Arizona, and California.

In the process of advising and organizing all of those changeouts, I have come to know a great many local woodstove dealers, particularly in small, rural communities. It is on their behalf that I offer some thoughts.

But first I should address an obvious, if unspoken, question that some may have:

Why, if this so important, haven't more of these small businesses come forward themselves? The answer is simple: they are afraid. Many of the retailers that need this relief are afraid, correctly or not, that to publicly announce they they did not clear their stock out on time, is to invite enforcement, either from OECA, or their local state agency. Consequently, I am here to speak on their behalf.

I suggest there are just 4 things to keep in mind.

- 1) Many of the dealers do not have any Step 1 stoves, particularly in larger markets, but of the 20-35% of the dealers who do, these represent a significant loss to these small businesses, which are principally rural stores.
- 2) The dealers that do have Step 1 units, may have only 15 – 30 such units with a total wholesale value of \$15,000 – \$30,000. This may represent a significant percentage of that store owner's net income for the year;
- 3) Many of the Step 1 pellet stoves and a good number of the the cordwood stoves were already certified at less than 3.5 grams per hour. All stoves had to be recertified after 2015, even those that were less than 2 gr/hr, due to the way the rule is written, and that impacted the number of Step 1 units (on paper, but not in terms of real world emissions);
- 4) Some have suggested that these stoves are substantially dirtier than Step 2 stoves, but the plain truth is that the EPA has done no in-home testing of Step 1 or Step 2 stoves, and has no way of knowing if these Step 2 stoves are an improvement or not.

So on behalf of small retailers in Wisconsin, Tennessee, Oregon, California, Minnesota, Ohio, New Hampshire, and many other states, I urge you to finalize this proposal. It is not a major impact on the

environment, but it will have a major impact on many small businesses, in rural communities, that have been hard hit by the economic shut down.