

***Advocacy Recommends that EPA revise the 2015 Wood Heaters Rule to Reduce Burdens on Small Manufacturers***

The U.S. Small Business Administration’s Office of Advocacy (Advocacy) submitted comments in response to the Environmental Protection Agency’s (EPA’s) November 30, 2018 notices on the New Source Performance Standard (NSPS) for Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces. EPA published a proposal to add a “sell-through” provision for new hydronic heaters and forced-air furnaces. [83 Fed. Reg. 61574 (November 30, 2018)], and an advance notice of proposed rulemaking seeking other comments on potential revisions to the 2015 final NSPS for this industry [83 Fed. Reg. 61585 (November 30, 2018)].

Advocacy strongly supports the proposal to provide a “sell-through” for hydronic heaters and forced-air furnaces and strongly supports extending a similar provision to wood heaters.

In addition, Advocacy recommends EPA consider the following measures to reduce the burdens on small businesses.

- Delay the step 2 compliance date by at least two years or longer in the absence of a “sell-through”.
- Review certification procedures to eliminate delays that do not contribute to environmental benefits.
- Reconsider treating residential wood heaters that burn cord wood and those that burn wood pellets as one product category.

