



To Whom It May Concern,

This letter is a response to the proposed Air Plan (SIP) for Fairbanks. Kozy Heat and the hearth industry have been vigilant to decrease the emissions of wood burning EPA certified room heaters. Manufactures of EPA certified room heaters are releasing models that are compliant with the NSPS 2020 requirements which dramatically drop the particulate emissions limit from 4.5 grams per hour to 2.0 grams per hour for crib wood and 2.5 grams per hour for cord wood. These requirements cover catalytic and non-catalytic wood EPA certified room heaters.

The data shown in Appendix III.D.7.7 which show the start-up emissions between a catalytic and non-catalytic EPA certified room heaters isolates such a small period of appliance operation and ignores the completely vetted NSPS with prescribed test methods and ignores the overall emissions of a EPA certified room heater. A similar argument could be made with a vehicles miles per gallon, MPG. When studying the emissions of a car's combined MPG compared to the MPG when a car is passing a slower vehicle on the road the MPG would be very different between the two scenarios and it would be isolating specific time frames to single out and prefer certain results. This is why the MPG of cars are viewed as an overall value. When looking at wood burning fireplaces **we have to stick to the proven system** of evaluating wood burning fireplaces based on their emissions results from the entire period of use. Evaluating EPA certified room heaters based on a complete burn cycle reflects real word use.

There are additional concerns around the proposed Air Plan (SIP) revolve around the use of a tapered element oscillating microbalance (TEOM). Fireplace manufactures have spent large amounts of money in R&D work to become 2020 compliant with their wood burning EPA certified room heaters. Who is going to pay for the additional testing? Which EPA certified labs have TEOMS? Are labs familiar with TEOM testing? How will this policy be enforced? Will TEOM test results be used to prohibit fireplaces with specific grams/hour on a specific burn cycle?

There was and still is a huge backlog of testing at EPA certified test labs for the new 2020 NSPS regulations. We are seeing testing labs have a 3-6 month wait to perform a round of testing. EPA certified room heaters very rarely pass the first attempt so there is a back and forth process where a manufacture sends the test lab a fireplace to test and then it goes back to the manufacture for modifications. It then gets sent back to the EPA test laboratory for the next round of testing. The actual testing process for a fireplace is a very lengthy and costly procedure. The entire process can easily take 1-2 years, if not longer.

The effects of this proposal will have major consequences to consumers and to small businesses. The proposal would decrease the available choices for consumers and the additional testing required from the proposed testing would increase the cost. These consequences would then flood into other industries. New construction and home reinvention will suffer from the lack of consumer products available and increased cost. The likelihood of consumers wanting to switch out their models would decrease due to increased cost and lack of options. EPA certified room heaters serve as starting point for many home renovation projects and become a focal point of design.

Assessing the consequences we have laid out in this letter why do you think catalytic and non-catalytic wood EPA certified room heaters require a new scope of scrutiny in the test data? Isolating specific sections of test data ignore the vast emission improvements required in NSPS 2020.

Due to the reasons listed above we strongly believe the proposed Air Plan (SIP) for Fairbanks is a step in the wrong direction for businesses and consumers alike. We believe a consistent message to businesses and consumers is important and the federal NSPS guidelines provide this message. Kozy Heat and the hearth industry have been making great strides in the reduction of emissions that benefit the consumers and the environment through becoming compliant with the 2020 NSPS requirements. If I can provide further clarity on any of these points or other matters concerning gas fireplace, please do not hesitate to contact me directly and thank you for considering the points presented here

Kyle Reasoner

204 Industrial Park Road | Lakefield, MN 56150

800-253-4904