



*Pellet Stoves
Wood Stoves
Lifestyle Products*

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October 28, 2021

Rafael Sanchez, Ph.D.
Wood Heater Program Lead
Air Branch
Monitoring, Assistance, and Media Programs Division
Office of Compliance
U.S. Environmental Protection Agency (EPA)
Room 7149-D
1200 Pennsylvania Ave., NW
MS:2227A
Washington, DC 20460
Ph. 202-564-7028

RE: Notice of Proposed Determination to Revoke Certificate of Compliance Number 193-19 for the 15-SSW01, 50-SHSSW01, 50-TRSSW01, 15-W03, 50-SHW03 and 50-TRW03 Wood Heater Model

Dear Dr. Sanchez,

This letter is in response to the notice that England's Stove Works received from EPA on or about September 30, 2021. In the letter, EPA states its intention to revoke the Certificate of Compliance Number 193-19 for the 15-SSW01, 50-SHSSW01, 50-TRSSW01, 15-W03, 50-SHW03 and 50-TRW03 Wood Heater Model.

The primary identified problem or irregularity is that the certification test did not use fuel pieces within the allowable moisture range. During EPA's post-certification review, it was determined that five pieces of test fuel fell outside that allowable range.

England's Stove Works objects to the Administrator's proposed determination. We contend that the certification test was performed by a EPA-certified laboratory, was then reviewed by a EPA-certified third party, and finally was reviewed and approved by EPA itself, as a compliant unit. By revoking the Certificate of Compliance, EPA is unfairly harming England's Stove Works' ability to continue to operate as a small business.

Under 40 CFR 60.539(a)(2), England's Stove Works may request a hearing on this proposed determination. As required by 40 CFR 60.539(b), England's Stove Works is formally submitting in writing a request for a hearing. This is being submitted within the allowable 30-day notice time period.

Sincerely,

Chris Terrell

Chris Terrell,
COO
England's Stove Works, Inc.
434-929-2517