Lisa,  

As you suggest, it’s hard to nail down from here, but depending on what the ANPRM tells us about the “need”, we are ready to proceed with working on better understanding test method variability over the next two or three years (likely starting with wood heaters and moving to hydronics, forced air furnaces and then pellet fueled appliance tests methods). We don’t have the bandwidth to handle all these at once, so we will roll through them in a staggered process. If all goes well, you should see our first proposal in 2020 and last final in 2023. Again, this is depending on what is viewed as the “need” as the public indicates in response to the ANPRM.

This timetable is still, for our staff and resources, quite aggressive and will require us to hit the ground running next spring/early summer. I would also say that it’s really a rough guess, and not anything formal/final.

Stef

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From: Lisa Rector <lrector@nescaum.org>  
Sent: Friday, December 7, 2018 7:16 AM  
To: Johnson, Steffan <johnson.steffan@epa.gov>; French, Chuck <French.Chuck@epa.gov>  
Subject: RE: clarification on timeline for Winter 2019 rulemaking

Thanks Stef, do you have any general timeline for the test method rulemaking. I understand that this is a difficult question so to clarify, I am wondering if you think rulemaking on test methods will take place this year, next year, 3-5 yr. process or something else?

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From: Johnson, Steffan <johnson.steffan@epa.gov>  
Sent: Friday, December 7, 2018 7:13 AM  
To: Lisa Rector <lrector@nescaum.org>; French, Chuck <French.Chuck@epa.gov>  
Subject: RE: clarification on timeline for Winter 2019 rulemaking

Lisa,

I can’t speak to the first question, but to answer the second one, it appears that rulemakings with respect to test methods will follow this initial ANPRM, which will be pointed at fixing rule text concerns and not specifically test methods.

This is not to say that language compliance testing cannot be addressed in your comments and I suspect that comments specific to rule language changes would be especially useful for Chuck and Rochelle.

Stef

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From: Lisa Rector <lrector@nescaum.org>  
Sent: Thursday, December 6, 2018 7:56 PM
To: French, Chuck &lt;French.Chuck@epa.gov&gt;; Johnson, Steffan &lt;johnson.steffan@epa.gov&gt;
Subject: clarification on timeline for Winter 2019 rulemaking

Chuck and/or Stef, can you please clarify the anticipated timeline and scope of the Winter 2019 rulemaking:

1) Winter 2019 – do you mean Feb/March 2019 or Nov/Dec 2019?
2) For the second rulemaking, informed by the ANPRM, do you anticipate that the 2\textsuperscript{nd} rulemaking will include proposing new test methods or do you plan additional rulemaking for test methods?

Lisa Rector, Policy and Program Director at NESCAUM
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