

Testimony on Michigan Senate Bill 910
Thursday May 15, 2014

Repeated in Testimony before Michigan State House of Representatives
Tuesday September 23, 2014

Good Morning.

My name is Warren Walborn. I am the President and Chief Executive Officer of Hawken Energy, Inc., one of the largest outdoor wood furnace manufacturing companies in the United States.

All of our facilities are located here in Michigan, but we sell our products in 25 states through a network of over 200 dealers.

We have been working on this EPA wood-burning issue since 2007 and we are very well-versed in the matter.

I have been told that, when the EPA passes rules as part of the Clean Air Act, they must be updated every 8 years. In 1988, the EPA passed regulations on wood burning appliances, but they have never been updated in the last 26 years. Last year, the EPA was sued over this issue by a group including several northeastern states, and as part of their settlement agreement, the EPA agreed to have updated rules in place by February 2015. Accordingly, the EPA has proposed new and updated rules regulating emissions from wood burning appliances.

I understand that Senate Bill 910 has been proposed by Senator Casperson and that this Bill is raising considerable awareness of this issue. At Hawken Energy, we strongly support logical and fair regulations that will protect the air that we breathe.

While we support the EPA's efforts to promote cleaner air, we fear that certain components of their proposed rules will have the opposite effect. For example, the EPA has proposed a 7.5 g/hr cap on all four test runs, and a third step to the emission standards on Wood Hydronic Heaters. Please note that precisely zero manufacturers (anywhere in the world) have successfully developed and tested any products that meet all the standards proposed in this rule.

This is remarkable. Particularly since we at Hawken Energy have developed a wood hydronic heater that is one of only three such products that have been tested and passed the newest EPA Phase 2 standards. How did we do this? Our secret is a patent pending technology that we developed here at Michigan-based Hawken Energy.

We took note of how the Michigan-based auto industry has cost-effectively met very strict EPA air emission standards for the past 37 years using catalytic converters.

In spite of likely over \$1 billion in R&D in the past more than 40 years, there have been no technologies that have emerged that reduce emissions more cost-effectively than catalytic devices. Accordingly, we at Hawken set out to find a way to incorporate catalytics into our wood burning furnaces.

We have set the standard for high tech wood burning. But in spite of these incredible advances we have made in reducing air emissions, the newly-proposed EPA rules are so ridiculously strict that they would halt all new product and technology development, and end all progress in our industry's efforts to encourage customers to change-out their old dirty and smokey appliances with newer cleaner-burning wood fueled appliances.

We have submitted comments to the EPA strongly urging them to eliminate the 7.5 g/hr cap, the Step 3 standard of 0.06 lbs of particulate output per MMBtu of heat output, and other confusing requirements such as requiring

testing to unproven standards, testing to multiple fuel types, and placing onerous requirements on certified laboratories.

Please remember that wood is the most abundant renewable fuel on the planet, and has been used as a primary heating fuel since the beginning of recorded history. Some sources have indicated that in one year, we have enough wood decomposing in America to heat our country for over 100 years.

Wood is a unique fuel in that it is deemed by the US Government as “Carbon-Neutral”. In other words, when a tree grows, it absorbs carbon in the form of carbon dioxide and stores it. When that same tree is burned in a wood-burning device, only that same amount of carbon is released back into the atmosphere – hence the term “Carbon-Neutral”. It is important to note that if that same tree were to, instead of being used as fuel, were to rot on the forest floor, the same amount of carbon would still be released back into the atmosphere. However, a tree that rots in the forest also produces methane, a greenhouse gas that is harmful to our environment.

Again, our goal at Hawken Energy is to provide products that unlock the world’s largest source of free heating fuel – wood – and enable our customers to stay warm, save money, reduce our dependence on foreign fossil fuels, and reduce harmful emissions.

Thank you.

Respectfully submitted,
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President & CEO
Hawken Energy, Inc.