



May 8, 2017

The Honorable Paul Ryan  
Speaker of the House  
U.S. House of Representatives

The Honorable Nancy Pelosi  
Minority Leader  
U.S. House of Representatives

The Honorable Greg Walden  
Chairman  
Committee on Energy & Commerce  
U.S. House of Representatives

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy & Commerce  
U.S. House of Representatives

The Honorable John Shimkus  
Chairman  
Committee on Energy & Commerce  
Subcommittee on Environment  
U.S. House of Representatives

The Honorable Paul Tonko  
Ranking Member  
Committee on Energy & Commerce  
Subcommittee on Environment  
U.S. House of Representatives

Dear Speaker Ryan, Minority Leader Pelosi, Chairman Walden, Ranking Member Pallone, Chairman Shimkus, and Ranking Member Tonko:

The Northeast States for Coordinated Air Use Management (NESCAUM) and the Hearth, Patio & Barbecue Association (HPBA) are writing to express our joint concern with H.R. 694 that would rescind the 2015 New Source Performance Standards (NSPS) for residential wood heating devices promulgated by the U.S. Environmental Agency (EPA). Our associations represent state environmental agencies and the wood heating appliance manufacturers.

The federal Clean Air Act requires EPA to review and update the NSPS, if appropriate, at least every 8 years, yet the original Residential Wood Heater NSPS was not revisited for almost 30 years after its inception in 1988. Since that time, the universe of residential wood burning sources has greatly expanded. Under the 1988 NSPS, many categories of devices, including outdoor wood boilers, pellet stoves, single burn rate stoves, and wood furnaces, were not subject to regulation. The 2015 NSPS expands the scope of the regulation to include these product categories and recognizes that the technology of previously-covered devices has improved in regards to reduced emissions and increased efficiencies.

The 2015 NSPS program reflects today's modern wood heating devices that provide important benefits to millions of Americans, especially those living in rural communities.

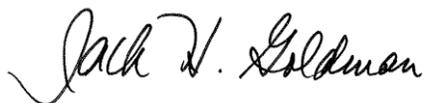
The program fosters the market for wood, which is an important domestic source of heating fuel. It will save consumers money, many of whom are low-income households, by lowering fuel costs through increased appliance efficiency. Replacing non-EPA-certified stoves with today's modern stoves will reduce health risks from exposure to wood smoke,<sup>1</sup> but this can only be done if products are clean burning, fuel efficient, and affordable. Finally, this program will ensure continued innovation in U.S. manufacturing that will help keep domestic companies competitive in the solid fuel industry.

In refining technologies over the years, many companies have invested significant resources to improve the performance of appliances. The 2015 NSPS is already fostering industrial innovation by North American wood burning equipment manufacturers and there are many devices currently available in the market that address the requirements of today's standards. Eliminating the NSPS will punish the companies that have invested in technology innovation and reward those who have not.

Cleaner devices will generate greater public acceptance of wood fuels for heating. We have already seen that in the absence of modern technology requirements, a number of states and municipalities have acted on their own in response to citizen complaints to limit or ban the use of wood burning devices.<sup>2</sup> Without an updated federal standard, the continuing sale of products conforming only to the 1988 version of the NSPS will potentially relegate the industry to an undesirable regulatory landscape where numerous state and local jurisdictions promulgate differing rules on what products can and cannot be sold. On the other hand, by fostering the creation of a diverse set of consumer choices for clean burning and efficient devices, manufacturers may have access to expanded market opportunities for their products.

We urge you to oppose wholesale repeal of the 2015 residential wood heater NSPS. In doing so, you will promote public health protection, lower heating costs, help build markets for locally-sourced domestic fuels and devices, and support North American manufacturers in a competitive international market. Representatives from our associations can provide further information upon request.

Sincerely,



Jack Goldman, President & CEO  
*Hearth, Patio & Barbecue Association (HPBA)*  
1901 North Moore St, Suite 600  
Arlington, VA 22209



Arthur Marin, Executive Director  
*Northeast States for Coordinated Air  
Use Management (NESCAUM)*  
89 South Street, Suite 602  
Boston, MA 02111

---

<sup>1</sup> See generally Curtis W. Noonan et al., *Assessing the Impact of a Wood Stove Replacement Program on Air Quality and Children's Health*, Health Effects Institute, Rep. No. 162 (December 2011), available at <https://www.healtheffects.org/publications>

<sup>2</sup> This includes, but is not limited to, parts of: Alaska, California, Colorado, Michigan, Oregon, Washington, Wisconsin, Vermont. See U.S. EPA, *Ordinances and Regulations for Wood Burning Appliances* (Accessed February 21, 2017), available at <https://www.epa.gov/burnwise/ordinances-and-regulations-wood-burning-appliances>.