

February 13, 2018

Bill Wehrum, Assistant Administrator Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Assistant Administrator Wehrum:

The Northeast States for Coordinated Air Use Management (NESCAUM) is writing in support of the 2015 Residential Wood Heater New Source Performance Standards (NSPS) and to express our concern about any possibility that EPA may propose weakening the standards. NESCAUM is the membership organization of the state air quality agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. We are the oldest regional association of state air agencies in the nation, and have been working in support of our member states' programs since 1967.

Wood is a domestic renewable energy resource for home heating, and as such can be an important part of a state's portfolio of renewable energy alternatives. With inadequate emission controls, however, wood burning can emit high levels of fine particulate and air toxics, potentially endangering public health. Nationally, residential wood heating accounts for 50 percent of all area source air toxic cancer risks and 20 percent of total stationary and mobile polycyclic organic matter emissions.¹ Within the NESCAUM states, residential wood heating accounts for 20 to 72 percent of direct fine particulate matter emissions annually.² 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. Without a strong federal standard that meets states' air quality and public health needs, each state will be obligated to address this large emissions sector individually, resulting in a chronic patchwork of state requirements that will increase costs to manufacturers, retailers, and ultimately consumers.

¹ U.S. Environmental Protection Agency. Process for Developing Improved Cordwood Test Methods for Wood Heaters Discussion Paper, March 2016. Accessed at https://www.epa.gov/sites/production/files/2016-03/documents/discussion_paper_-_process_for_dev_imp_cwtm_030916.pdf on September 11, 2017.

² Based on analysis of 2014 National Emissions Inventory data.

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 unregulated residential wood heating devices greatly expanded, including outdoor wood boilers, pellet stoves, single-burn-rate stoves, and wood furnaces. In some cases, these units have created significant public health and pollution issues, forcing over 50 state and local regulatory agencies to enact emissions standards for different devices not covered by the federal NSPS.

The 2015 NSPS addressed this product diversity, and created a level playing field among the new product categories. Furthermore, the 2015 NSPS program struck a balance between state and industry needs. Relaxing the current federal standards in the face of the public health impacts and complaints experienced within the states can have the unintended consequence of fostering the creation of a regulatory landscape where numerous state and local jurisdictions promulgate differing rules on which products can and cannot be sold.

As demonstrated by current market information, manufacturers of modern wood heating devices are producing many high-efficiency and low-emitting units capable of meeting EPA's Step 2 standards. These units provide important health and economic benefits to millions of Americans, especially those living in rural communities. They 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 also reduces health risks from exposure to wood smoke. Finally, this program helps ensure continued innovation in U.S. manufacturing that will help keep domestic companies competitive in the world-wide solid fuel thermal industry, where more stringent regulations already apply in many foreign markets.

The 2015 NSPS is already fostering industrial innovation by North American wood burning equipment manufacturers as highlighted by the numerous devices that are now on the market at Step 2 levels. Revising the NSPS at this late date will punish the companies that have invested in technology innovation and reward those that have not. Retaining the NSPS 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. We urge you not to relax the 2015 Residential Wood Heater NSPS.

Throughout the process of developing the NSPS, NESCAUM and our member states worked closely with our counterparts in the Midwest and Western states, industry and EPA. We would welcome an opportunity to meet with you to share and discuss states' interests and issues related to the residential wood heater NSPS.

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur N. Marin". The signature is fluid and cursive, with the first name "Arthur" being the most prominent.

Arthur N. Marin, Executive Director

Cc: Mandy Gunasekara, OAR
Peter Tsigotis, OAQPS
Gautam Srinivasan, OGC
NESCAUM Directors