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EPA Docket Center
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Attention Docket ID Number EPA-HQ-OAR-2009-0734
U.S. Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20004

To Whom It May Concern:

On behalf of the National Association of Clean Air Agencies (NACAA), we are pleased to provide the following comments on the U.S. Environmental Protection Agency's (EPA) proposed New Source Performance Standards (NSPS) for new residential wood heaters, published by the agency on February 3, 2014 (*79 Federal Register* 6330).¹ NACAA is a national, non-partisan, non-profit association of air pollution control agencies in 42 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. These comments are based upon that experience. The views expressed in these comments do not necessarily represent the positions of every state and local air pollution control agency in the country.

NACAA welcomes this proposal, which marks the first time EPA has revisited emission limits for new woodstoves and heaters since 1988. According to EPA, residential wood combustion is responsible for more than 345,000 tons of fine particulate matter (PM_{2.5}) emissions a year nationally² causing many counties across the country either to exceed, or come precariously close to exceeding, the health-based National Ambient Air Quality Standards (NAAQS) for PM_{2.5}. In addition to PM_{2.5}, residential wood smoke also contains other harmful substances including carbon monoxide, nitrogen oxides and toxic air pollutants, such as polycyclic organic matter (POM), polycyclic aromatic hydrocarbons, formaldehyde, benzene and dioxin. EPA estimates that 44 percent of all stationary and mobile source POM, almost a quarter of

¹ *Proposed Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters* (Proposed NSPS for Residential Wood Heaters), U.S. Environmental Protection Agency (February 3, 2014) – <http://www.gpo.gov/fdsys/pkg/FR-2014-02-03/pdf/2014-00409.pdf>.

² *Strategies for Reducing Residential Wood Smoke*, U.S. Environmental Protection Agency (March 2013), p. 4 – <http://www.epa.gov/burnwise/pdfs/strategies.pdf>.

all area source air toxic cancer risks and 15 percent of non-cancer respiratory impacts can be attributed to residential wood combustion.³

Therefore, NACAA is very pleased with many features of EPA's proposal, which will lead to important improvements in, and broader federal control of, residential wood combustion devices.

We cannot overstate the importance of federal standards for these sources. Residential wood combustion is extremely difficult to regulate at the state level because the devices are installed and operated in private homes and consumers are able to purchase wood heaters and stoves outside their own state (which could enable a consumer to purchase a device that does not meet the standards of his state of residence). In the absence of strong new federal standards, states and localities will have no choice but to pursue or build upon their own regulatory programs in order to attain and maintain NAAQS and/or meet other clean air goals.

We endorse EPA's proposal to apply, for the first time, federal emission limits to an expanded array of new residential wood combustion devices. While the current NSPS applies to a narrowly defined set of indoor wood stoves, excluding a broad range of residential wood heating devices, the agency's proposal appropriately includes new indoor and outdoor hydronic heaters (also known as wood-fired boilers), single burn rate stoves, forced-air furnaces, masonry heaters and additional pellet stoves.

We are also in favor of rigorous emission limits for all sources affected by the proposal including for new adjustable burn rate wood heaters – those that were the focus of EPA's 1988 rule – as well as for newly covered devices.

EPA is required, under section 111 of the Clean Air Act, to promulgate federal NSPS for any category of new stationary sources that the Administrator finds "causes, or contributes significantly to, air pollution which may reasonably be anticipated to endanger public health or welfare." The law also requires EPA to review an NSPS every eight years unless the agency determines a review is not appropriate "in light of readily available information on the efficacy of such standard." Based on its review, EPA is required to revise the NSPS, if needed, to reflect improvements in methods for reducing emissions. In 1987, EPA appropriately determined that the residential wood heater source should be subject to federal emissions standards under section 111. The agency then established the first NSPS for wood heaters in 1988 but has not conducted a review of the standards since that time. Meanwhile, our national understanding of the serious impacts of particulate pollution, including from residential wood heating, on public health and welfare has grown immensely in the last 25 years with an ever-increasing body of scientific evidence. Further, during last quarter century, there have been substantial advances in technologies for residential wood burning and controlling emissions. It is critical that our federal residential wood heater NSPS now "catch up" with proven science and technology.

Accordingly, although NACAA supports numerous facets of EPA's proposed rule, there are several provisions that could be strengthened. We believe manufacturers can do better than what EPA has proposed, especially with regard to the level of the emission standards and the pace of required improvements.

³ Proposed NSPS for Residential Wood Heaters, p. 6332.

The CAA calls upon EPA to set NSPS that “reflect the degree of emission limitation achievable through the application of the best system of emission reduction [BSER] which (taking into account the cost of achieving such reduction and any non-air quality health and environmental impact and energy requirements) the Administrator determines has been adequately demonstrated.” With respect to the standards, we note that under EPA’s proposal, approximately half, if not more, of new woodstoves already meet a standard of 3.5 grams PM per hour – which is lower than the proposed Phase 1 standard of 4.5 grams PM per hour. In many areas suffering the consequences of elevated PM levels from residential woodstoves, the Phase 1 standard of 4.5 grams PM per hour will provide no additional relief at all. NACAA recommends that this Phase 1 standard be tightened.

EPA has put forth its proposed emission standards based on a two-step, five-year compliance approach, which is the agency’s preferred option, and has also offered an alternative of a three-step, eight-year approach. NACAA favors EPA’s preferred option of a two-step approach and, further, urges that EPA accelerate implementation of the second, tighter phase of standards where practicable.


Finally, in addition to setting more stringent emission standards, EPA should develop a testing methodology that represents real-world conditions – that is, how the affected appliances are used in the home. NACAA recommends that EPA, as soon as possible, establish an emissions factor for cord wood combustion instead of using crib wood for emissions certification, and also ensure that the transition from the crib test method to the cord test method results in an equivalent Phase 2 emission standard.

On behalf of NACAA, we thank you again for this opportunity to provide comments on this proposal and look forward to working with EPA and other stakeholders to ensure an effective final rule that will yield meaningful reductions in emissions from residential wood heaters and improved air quality across the country.

Sincerely,



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