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Testimony of
Nancy L. Seidman
on behalf of the
National Association of Clean Air Agencies
before the
U.S. Environmental Protection Agency
on the

Proposed Standards of Performance for New Residential Wood Heaters,
New Residential Hydronic Heaters and Forced-Air Furnaces,
and New Residential Masonry Heaters
Docket ID No. EPA-HQ-OAR-2009-0734

February 26, 2014
Boston, MA

Good morning. My name is Nancy L. Seidman and I am an Assistant Commissioner at the Massachusetts Department of Environmental Protection. I am here today on behalf of NACAA – the National Association of Clean Air Agencies. Thank you for this opportunity to testify 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 over 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 all area source air toxic cancer risks and 15 percent of non-cancer respiratory impacts can be attributed to residential wood combustion.³

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>.

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

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).

Further, 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.

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. We are still studying these provisions, but for example, with respect to the standards, under EPA's proposal, at least 70 percent of the affected devices already meet a standard that is one-third lower than the proposed Phase 1 standard of 4.5 grams PM per hour.

EPA has proposed that the final emission standards represent the "best system of emission reduction" (BSER) – technology that the Administrator has determined exists and has been adequately demonstrated. (In determining BSER, the Administrator also takes into consideration cost as well as non-air quality health and environmental impacts and energy requirements.) EPA has proposed a preferred compliance option and an alternative. We favor EPA's preferred option of a two-step, five-year compliance approach over the alternative of a three-step, eight-year approach. However, we question whether five years, as contemplated under the preferred option, is too long given that the proposed final standards, based on BSER, are already being met by top industry performers.

Finally, while more stringent emission standards are a positive step, EPA should develop a testing methodology that represents real-world conditions. In order to make tighter standards more meaningful, NACAA recommends that EPA, as soon as possible, establish an emissions factor for cord wood combustion instead of using kiln-dried crib wood for emissions certification.

In the coming weeks, NACAA will continue to study these and other aspects of the proposal and will provide more specific written comments by the May 5, 2014 deadline. In the meantime, we thank you again for this opportunity to testify 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.