

WESTERN STATES AIR RESOURCES COUNCIL



July 18, 2011

Mr. Steve Page, Director
Office of Air Quality Planning and Standards
Office of Air and Radiation
U.S. Environmental Protection Agency
Mail Code: C404-04
Research Triangle Park, NC 27711

Dear Mr. Page,

WESTAR supports an update to the Residential Wood Heater New Source Performance Standard (NSPS) and is encouraged that EPA is proceeding with the regulatory process to do so. Residential wood combustion is a leading cause of unhealthy levels of fine particulate and air toxics and the primary source of non-attainment with the 24 hour $PM_{2.5}$ NAAQS in airsheds throughout the West. Other areas impacted by residential wood smoke are monitoring $PM_{2.5}$ levels close to the current standard. In addition, the health science has led EPA to lower the $PM_{2.5}$ NAAQS over time and, as you know, EPA is currently considering a more stringent standard.

It has been more than 20 years since EPA revisited the wood heater NSPS and EPA must now use this opportunity to make the standards more protective of public health. An essential part of EPA's NSPS evaluation is to make sure that any proposed changes do not result in backsliding of public health protection and undermine the credibility of EPA's wood heater certification program. We are writing at this time to urge EPA to put in place a more stringent standard for residential wood heaters (wood stoves and fireplace inserts). We understand that almost 90 percent of the currently certified wood stoves and fireplace inserts would meet a standard currently contemplated by EPA.

The NSPS requires that EPA establish standards on the basis of the "best system of emission reduction." However, the level under consideration by EPA appears to be based primarily on an economic analysis which assumes high development costs which are not passed on to consumers and not primarily on an assessment of the best technology. Absent a more stringent standard, based on the best performing units, there is no incentive for manufacturers to develop heaters that will be cleaner burning than today's appliances. In addition, changes to the certification test

method that have the effect of reducing its stringency are inappropriate and undermine the integrity of the certification process.

The label “EPA certified” carries great weight with the public and with state and local regulators and the fundamental credibility of that label must be rigorously protected by EPA. This means that the wood heater NSPS, including the level and form of the standard and underlying test methods, should be designed to balance the need for appliances that both perform well in the home and produce reproducible results in the laboratory.

State and local governments have and will invest millions of dollars in communities across the nation to replace old dirty wood burning devices with EPA certified stoves. They must be able to trust that EPA certification means those devices are the cleanest wood burning devices possible.

WESTAR member states are also very concerned about the prospect of eliminating the requirement that a wood heater be tested at a low burn rate (less than one kilogram/hr) since a low heat output test is essential to demonstrating the full range of a wood heater device emission performance in the real world.

WESTAR member states are also concerned about the new NSPS being developed for residential Outdoor Woodfired Boilers (i.e. Hydronic heaters). We are developing comments to submit to EPA in a separate letter.

In conclusion, the recognition that residential wood heating is and will continue to be a major source of air pollution requires that EPA establish more stringent wood heater emission limits and associated certification test protocols to ensure that we can make progress in cleaning the air. We look forward to continuing our discussions on revisions to the NSPS. If you have any questions about the concerns expressed in this letter, please contact Dan Johnson at 206-254-9145.

Sincerely,



David Collier, President
Western States Air Resources Council

cc: Arthur Marin, NESCAUM
Gil Wood, EPA
Greg Green, EPA