My name is Mary Uhl. I am the Executive Director of the Western States Air Resources Council, an association of 15 western state air quality agencies. Our membership spans the west from the Dakotas, Wyoming, Colorado and New Mexico, to the Pacific Coast and includes Alaska and Hawaii. Given time and resource constraints of our member states, not all WESTAR members have been able to analyze and review the testimony I present today.

Thank you for the opportunity to appear before you today to share our perspective on potential changes to residential wood heating appliance New Source Performance Standards. Since EPA published the Notice of Proposed Rulemaking (NPRM), the subject of this hearing, and the Advanced Notice of Proposed Rulemaking (ANPRM) less than one month ago, the WESTAR member states have not yet completed their analyses and reviews of the proposal and advanced notice.

As a result, my comments today will be limited to a preliminary response to the NPRM request for comment on the two-year delay of the Step 2 compliance date for residential wood heaters. Last week we wrote Acting Administrator Wheeler to request more time to review and comment on the NPRM and ANPRM and requested that EPA hold an additional public hearing on the NPRM in the western United States. I renew our requests here today.

Reducing emissions from residential wood heating devices is of critical importance across the west. Many communities that are adversely impacted by wood heating are located in valley settings that are subject to wintertime temperature inversions, trapping wood smoke and exposing the public to unhealthy levels of particulate pollution. Residential wood heating has been a source of public health concern and western states have developed and implemented regulatory and voluntary strategies to address the problem since the 1980s. A key element of those strategies is a strong and effective NSPS, so that only the cleanest burning new appliances are installed in our airsheds.

The WESTAR region encompasses large and small cities that have been in nonattainment due to residential wood heating but are now in attainment; areas that are now in nonattainment as well as communities that are on the verge of becoming nonattainment due to wood smoke. Communities adversely impacted by residential wood heating in the west range from large urbanized areas like Tacoma, Washington; Sacramento, California and the Salt Lake City region to smaller towns, like Libby Montana; and Oakridge, Oregon and current PM2.5 nonattainment...
areas West Silver Valley, Idaho; Portola, California and Fairbanks, Alaska, a place that has the unhealthiest air in the country because of residential wood heating emissions.

Strategies to improve and maintain air quality in residential wood heating impacted airsheds require a combination of federal, state and local actions. States have a crucial need for stringent new appliance standards to complement state and local regulatory and voluntary activities like curtailment programs during wood smoke pollution episodes and publicly financed stove ‘change-outs’ that replace dirty stoves with newer, cleaner ones. Residential wood heaters have useful lives that may span 20 to 30 years. Unless the cleanest new devices are installed in homes, the necessary emission reductions will not materialize, and other, sometimes more burdensome restrictions on the use of wood for heat may be required to retain or regain good air quality.

WESTAR believes that there are far more residential wood heaters available to consumers (wood stoves, fireplace inserts and pellet stoves) that can meet the Step 2 standard than indicated in the NPRM. These types of appliances are found throughout the west and airtight wood stoves and fireplace inserts are the main source of the residential wood heating pollution problem in the west. EPA identifies a total of 74 models that qualify as Step 2 certified (based on the March 2018 EPA certified stove list). However, the total number of models meeting the Step 2 emission limit of 2 gm/hour (or 2.5 gm/hour when tested with cord wood) appearing on the EPA certified stove list from May 2018 totals more than 200. The difference between the Step 2 certified models and the Step 1 models that meet the Step 2 emission limits are largely administrative (CO and efficiency data had to be collected after the 2015 NSPS revisions). Because the testing protocol is substantially the same, we have every expectation that Step 1 certified wood heaters meeting the Step 2 standard will again meet the more stringent standard if retested.

In addition to manufacturers of Step 1 compliant models that have already demonstrated they can meet the Step 2 standard, but must re-test and report CO and efficiency, we are aware of appliances that have completed 2015 NSPS certification testing, meet the Step 2 standard and may have applied for certification, but are not yet certified.

Our preliminary analysis leads us to conclude that Step 2 technology-based Best System of Emission Reduction established in the 2015 NSPS rulemaking has been adequately demonstrated for residential wood heaters, and a sufficient number of models will be available well before the May 2020 deadline to satisfy consumer choice. There is no need for an extension to the compliance deadline for this category of appliances.

In the spirit of cooperative federalism, we believe that EPA has provided inadequate time to thoughtfully analyze and comment on the notices and should increase the time available to comment. Last week, we formally requested that EPA extend the comment period for the NPRM from 45 to 90 days and the ANPRM from 75 to 120 days. We make that request again today.

Finally, because of the impact of residential wood heating on western airsheds, we request that EPA hold an additional hearing on the NPRM in the western U.S.
Thank you again for the opportunity to present a western states perspective on the potential changes to the residential wood heating New Source Performance Standards.