



December 14, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Washington DC 20460

Dear Acting Administrator Wheeler,

The Western State Air Resources (WESTAR) Council, an Association of 15 western state air quality agencies, requests that EPA: 1) extend the public comment periods for the Notice of Proposed Rulemaking (NPRM) and the Advanced Notice of Proposed Rulemaking (ANPRM) for the Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces (NSPS) published in the *Federal Register* on November 30, 2018 (83 Fed. Reg. 61574 and 83 Fed. Reg. 61585); and, 2) provide for a second public hearing to be located in the western United States.

In the NPRM, EPA proposes to remove the sales limitation to Step 2 certified hydronic heaters and forced-air furnaces (covered in subpart QQQQ) by allowing Step 1 certified appliances to be sold at retail for an additional two years, from May, 2020 to May, 2022 (described as a “sell-through”), and requests comment on a similar “sell-through” provision for residential wood heaters (subpart AAA).

In the ANPRM, EPA seeks comment on a broad range of issues related to the NSPS including: new cordwood certification test methods; Step 2 compliance date and form of compliance (based on a weighted average versus individual burn rate results); compliance audit testing; ISO-accredited third-party certification review; electronic reporting; and appliance warranty provisions, among other issues. These issues are complex, have significant air quality ramifications and warrant careful consideration

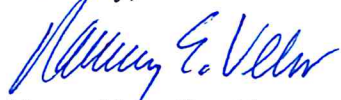
by western state air quality agencies. Our member states rely on the emission reductions in the NSPS as a significant and in some instances sole strategy to address nonattainment or for maintaining good air quality in their maintenance and attainment areas.

The 45-day comment period for the NPRM is scheduled to close on January 14, 2019, and the 75-day comment period for the ANPRM is scheduled to close on February 13, 2019. Given the staff resources required to perform the necessary technical and policy analysis converging with end of the calendar year and holiday season timing, WESTAR requests that the public comment period for the NPRM be extended at a minimum to a total of 90 days and for the ANPRM to a total of 120 days. These extensions will allow for thorough evaluation of these actions and ultimately help EPA understand the implications of these rulemakings to states.

In addition, WESTAR requests that EPA convene a second public hearing, to take place in the western United States. We suggest Seattle, Washington; Portland Oregon; or Denver, Colorado. With the December 17, 2018 public hearing scheduled to take place on the east coast with only two weeks' notice, some western state agencies may have great difficulty processing travel authorization or obtaining affordable transportation and lodging because of the holidays.

Thank you for consideration of these requests. Please announce your decisions regarding these requests as soon as possible so that state agencies can plan accordingly. If you have questions or need additional information, please do not hesitate to contact WESTAR Executive Director Mary Uhl.

Sincerely,



Nancy Vehr, President

Western States Air Resources Council

cc: Bill Wehrum, Assistance Administrator, EPA Office of Air and Radiation