

Compliance Extension for the Residential Wood Heating New Source Performance Standards  
Testimony of Mary Uhl  
Western States Air Resources (WESTAR) Council  
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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, Colorado and New Mexico, to the Pacific Coast and includes Alaska and Hawaii.

Thank you for the opportunity to share our perspective on the importance of effective control of residential wood heating appliance emissions and the New Source Performance Standards. We will submit additional written comments on this NPRM.

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; Oakridge, Oregon and current PM<sub>2.5</sub> nonattainment areas West Silver Valley, Idaho; Portola, California; Fairbanks, Alaska; and, Klamath Falls, Oregon, a place that has the unhealthiest air in the country – due to residential wood heating emissions.

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. In fact, some nonattainment area SIP control strategies depend on Step 2 stoves to get the area back into attainment.

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 job producing industries may be required to regain good air quality.

After over thirty years since the original 1988 NSPS standards, residential wood heating is still a significant air pollution problem throughout the west. It is so significant that the only way many areas can maintain good air quality is to stop people from burning wood for heat during pollution episodes.

While we recognize the difficult economic environment some businesses have experienced through no fault of their own as a result of the Covid-19 pandemic, we do not believe it is warranted to continue to allow the sale of Step 1 appliances beyond the deadline established in the 2015 NSPS.

In this latest proposal, EPA has failed to produce concrete data on either the ‘stranded inventory’ or the associated health impacts of allowing non-compliant appliances, which will continue to pollute for 20 to 30 years. In early April, EPA determined that there was no justification for granting an additional ‘sell-through’. According to *Hearth and Home Magazine*, retailers across the country saw increased hearth products sales every month over the previous year leading up to March, 2020.

Many of the Step 1 stoves in the 2015 update were originally certified to meet the 1990 emission limits and were subsequently grandfathered until 2020. This makes this technology 30 years old already! This lenient Step 1 standard was intentionally set to allow industry to devote its’ resources to develop models for the more stringent Step 2 standard. In contrast to the original 1988 NSPS, in which manufacturers and retailers were allowed only two years to transition to more stringent standards, they received five years in the 2015 NSPS update. Many companies rose to the challenge. By October, 2018, 37 manufacturers had certified 105 residential wood heater model lines.

Allowing a ‘replacement period’ undermines the incentives so important to the success of the performance certification program by punishing those manufacturers and retailers that have innovated and prepared for the regulatory deadline and rewards those that have overproduced and undersold older, dirtier technology appliances. Allowing an unknown number of outdated polluting appliances will have a lasting adverse impact on airsheds across the west.

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.