

August 3, 2012

Honorable Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
Mail Code: 6102T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: New Source Performance Standard for Residential Wood Burning Devices

Dear Administrator Jackson:

State and local air quality management agencies from across the country urge EPA to expeditiously promulgate an update to the New Source Performance Standard (NSPS) for Residential Wood Burning Devices. With EPA's recent proposal to strengthen the national ambient air quality standard for fine particulate matter, updating this performance standard to reflect best demonstrated emission controls, and to broaden the standard to address devices that are not included in the current NSPS is now more important than ever.

Wood is a domestic renewable energy resource for home heating, and as such can be an important part of a state's portfolio of renewable energy alternatives. However, with inadequate controls, wood burning can emit high levels of fine particulate and air toxics, potentially endangering public health. Over the 20-plus years since EPA promulgated the NSPS for Residential Wood Burning Devices, improved technologies to limit emissions from these devices have been developed and demonstrated. Many manufacturers have been building wood heaters with emission rates far below EPA's current standards, and have for many years. Consistent with Section 111 of the Clean Air Act, we urge EPA to move forward with a revision to the NSPS that reflects the best system of emission reduction that has been adequately demonstrated. Moreover, EPA should examine the testing methods used to determine compliance with the standards, and revise the methods as appropriate and necessary to accurately determine emission performance. Both strong emissions standards and an accurate emissions test method are essential to the continued credibility of EPA's wood heater certification program.

In summary, an update to the NSPS for Residential Wood Burning Devices is long overdue, and with EPA's latest proposal for a more stringent fine particulate standard, EPA has effectively acknowledged the public health impacts from fine particulate matter at concentrations far lower than the levels contemplated in 1988, when this NSPS was first promulgated. We will continue to work with EPA on this important effort in the coming months knowing that the alternative is for state and local agencies to undertake rulemaking on their own, faced with many of the same

challenges that EPA faces but without EPA's resources or expertise. Accordingly, it is EPA's responsibility to expeditiously promulgate new performance standards for wood heaters that encompass the full range of wood heating devices in use today, and that reflect best demonstrated technologies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Johnson', with a large, stylized initial 'D'.

Dan Johnson
Executive Director
WESTAR

A handwritten signature in black ink, appearing to read 'Arthur Marin', with a large, stylized initial 'A'.

Arthur Marin
Executive Director
NESCAUM