

## Comments on “Proposed Amendments to the NSPS for Residential Wood Heaters”

Docket No. EPA-HQ-2018-0195

Testimony of Laura Kate Bender  
National Director, Advocacy, Healthy Air Campaign  
American Lung Association

December 17, 2018

Good morning. My name is Laura Kate Bender and I am the national director of advocacy of the American Lung Association’s Healthy Air Campaign. The Lung Association is the nation’s oldest voluntary health organization. Our mission is to save lives by improving lung health and preventing lung disease.

The American Lung Association opposes the proposed amendments to the New Source Performance Standards for Residential Wood Heaters. We urge EPA to maintain the current standards, as any additional sales of higher-polluting wood heaters will result in years of dangerous emissions that should have been prevented.

The Lung Association will offer separate comments on EPA’s Advance Notice of Proposed Rulemaking on the NSPS and will urge EPA to maintain the current step 2 emissions limits and compliance deadlines.

The 2015 New Source Performance Standards placed more protective limits on pollution from new wood-burning boilers, furnaces, and stoves – the first updates to the standards for these types of devices in 27 years. The new standards reflected the improved technology that was already widely in use. Once fully in place in 2020, the standards will result in a nearly 70 percent reduction in fine particles and volatile organic compounds and a 62 percent reduction in carbon monoxide.

The Lung Association advocated in strong support of updating these standards and asked that they be even more protective than what EPA proposed and ultimately finalized. Strong protections against wood smoke emissions are critical because these emissions include particulate matter, carbon monoxide, nitrogen oxides, volatile organic compounds, and hazardous air pollutants that include several carcinogens.

In the short time since the updates were finalized in 2015, the science on the health harms of particulate matter has grown even more alarming. Increased evidence exists now for a wide array of health harms from this pollutant. The evidence is very clear that PM causes premature death, short- and long-term respiratory problems, and cardiovascular harm. Particle pollution also causes lung cancer. The research also shows that long-term exposure to PM is likely to cause nervous system harm and may also cause reproductive and developmental impacts – including low birth weight in babies – and the development of diabetes. No threshold exists for harm from particulate matter, and many populations are at increased risk, including people with asthma and other lung diseases.

One of the ways the Lung Association urged EPA to strengthen the NSPS in our comments was to reduce the uncommonly long timeline for compliance. We said in 2014,

“The EPA has neglected its responsibility to update the standards for new devices for 17 years, increasing the need to provide the best systems of emission reduction as soon as possible, not five or eight years down the road. Normally, new source performance standards must be met immediately by the affected industry... the technology needed to meet these standards exists and is in use today. The European System shows that

comparable units are possible and produce greater efficiency in wood use and heat production (MusilSchläffer et al., 2010). Furthermore, many American manufacturers produce many product lines that already meet these standards.”

The final rule did not heed our request and included what we deemed an “unusually long phase-in period” before the limits will come into effect in 2020. Any delay in the full implementation and enforcement of the 2015 standards will mean that homeowners install new wood-burning boilers, furnaces and stoves that produce far more dangerous air pollution than modern, state of the art, cleaner units would. We oppose any additional delays, including the sell-through period that EPA is proposing.

Allowing the continued sale of non-compliant devices is unacceptable. Due to the long lives of these devices, they would continue to spew toxic pollution for decades. The result would be years of health problems from wood smoke pollution that could have been prevented.

Toxic wood smoke emissions have real health impacts on real people. Here are a few excerpts from stories that people across the country have shared with the Lung Association about the impact of wood smoke on their health:

Diane in North Carolina said,

Practically everyone here either has a wood stove or fireplace. There are many days that we can't go outside of our own home. I have COPD, and it's so very hard for me to breathe ... Hopefully, we'll be moving soon because I feel like a prisoner in my own home.

Martha in New York said,

My husband and I both have asthma. We live in a rural area...and we are surrounded by people who use indoor wood stoves all winter long... We are at the bottom of a hill and acrid wood smoke penetrates our (new, well built) house. We sometimes cough for weeks when the smoke starts up.

Susan in New Jersey said,

My next door neighbor began burning wood for heat in a wood stove. Our homes are close together, and our property, cars and even the inside of our home regularly become invaded with toxic, noxious wood smoke and fumes. My husband and daughter have asthma. The regular exposure to wood smoke on our own property has caused their asthma to worsen ... My family has become ill and that is not right.

The American Lung Association asks EPA to reject this proposal to delay full implementation of the New Source Performance Standards. Additional sales of polluting devices mean years of additional pollution and real harm for American families.

Thank you.