

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

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Good morning. My name is Laura Kate Bender and I am the national assistant vice president for healthy air at the American Lung Association. Our mission is to save lives by improving lung health and preventing lung disease.

The American Lung Association opposes the proposed delay in full implementation of Step 2 of the New Source Performance Standards for Residential Wood Heaters. Allowing six months of additional sales of polluting wood heaters will mean real health harms for Americans. The COVID-19 pandemic makes it more important – not less – that EPA fully implement and enforce the standards on time.

As the nation’s premier lung health organization, to say that the American Lung Association takes the COVID-19 pandemic seriously is an understatement. We put a high priority on protecting the community we serve with lung disease and the American public at large. In fact, I’ll take this moment to remind everyone of the continued importance of social distancing and hand-washing, and note that we have up-to-date information available at lung.org/covid19.

However, the pandemic is not adequate justification for the action that EPA is proposing due to the public health imperative of cleaning up dangerous wood smoke pollution.

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. 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. 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 the risk is not shared by everyone equally. At the Lung Association, we often say that someone in every family is at increased risk of health harms of air pollution. But in too many cases, entire families are at greater risk. In its 2019 Integrated Science Assessment for PM, EPA found that nonwhite populations – and especially black populations – face higher risk from particle pollution.

What's more, the COVID-19 pandemic underscores the importance of lung health, and unfortunately has further exacerbated disproportionate harms. Emerging evidence links higher levels of particle pollution exposure over the long term to higher death rates from COVID-19. During this pandemic, people who live near polluting sources will face multiple threats to their lungs at once. And even when the COVID risk has subsided, the dirty woodstoves that would be sold during this delay would continue polluting communities for years and even decades to come.

I'll also note that when the NSPS were under development, the Lung Association urged EPA to reduce the uncommonly long timeframe for compliance. We said in 2014,

"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. 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. However, this decision has meant that retailers had ample time to plan to comply by the May 15 deadline.

Then, in April 2020, EPA declined to finalize a two-year sell-through period for more polluting wood heaters after finding that the evidence did not support manufacturers' and retailers' claims of harm of complying with the original timeline. In that final rule, EPA noted that the peak selling season for new woodstoves ends in March.

And yet now, in this new proposed delay, EPA cites retailer claims that the COVID-19 pandemic began impacting sales on March 15. It is extremely difficult to imagine how a maximum of 16 days of sales impacted in March could possibly justify the six-and-a-half-month extension that EPA is proposing.

Here's the bottom line: 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. The American Lung Association asks EPA to reject this proposal and prevent real harm to American families.

Thank you.