

SUMMARY OF 2018 ACTIONS RELATED TO AIR EMISSIONS REQUIREMENTS FOR NEW RESIDENTIAL WOOD AND PELLET STOVES, FORCED-AIR FURNACES AND HYDRONIC HEATERS

SUMMARY OF ACTIONS

- On November 21, 2018, the U.S. Environmental Protection Agency (EPA) proposed amendments to the New Source Performance Standards (NSPS) for Residential Wood Heaters issued in 2015. The proposed amendments would allow retailers additional time to sell the existing inventory of hydronic heaters and forced-air furnaces. EPA is also taking comment on a similar sell-through provision for wood stoves and on whether the pellet fuel requirements should be revised.
 - This action does not propose any delay in compliance – it simply seeks to ensure the full 5-year compliance period is available for manufacturers as clearly intended in EPA's 2015 rulemaking.
 - The proposal would provide relief to retailers so that they can sell the existing wood heating devices in their inventory. The proposal would indirectly provide relief to manufacturers who state they are currently facing some reluctance from retailers to purchase wood heaters that would not be allowed to be sold after May 2020 under current regulations.
- In addition, EPA is issuing an Advance Notice of Proposed Rulemaking (ANPR) to seek comment on several aspects of the 2015 NSPS, including the feasibility of the upcoming May 2020 compliance date for manufacturers of hydronic heaters, forced-air furnaces, and wood stoves and pellet stoves to meet a second, more stringent emission limits, known as the Step 2 limit.
- The proposed amendments are expected to save the industry approximately \$33 million total during the period 2019-2022. Many wood heater retailers and manufacturers are small businesses. The proposal would also forgo less than 2% (about 257 tons) of the reduced PM_{2.5} air emissions expected from the 2015 NSPS for the years 2019 to 2022 (12,638 tons).
- Today's action will not affect existing units that are currently in use in people's homes. It also will not replace state or local requirements governing wood heater use. The proposed amendments would help ensure that in the future consumers buying wood heaters anywhere in the United States will be able to choose from cleaner-burning models.

Basis for Actions

- EPA is reviewing the 2015 NSPS in light of concerns states and other stakeholders have raised about key requirements in the rule. Among those concerns is that the emissions tests

the 2015 rule established for determining compliance with the standards do not reflect how residential wood heaters are typically operated -- including the type of firewood most people burn. As a result, the rule may not be achieving the environmental benefits it was supposed to provide.

- To address this, EPA is beginning work to ensure its emissions test methods for wood heaters are based on the type of firewood a typical homeowner burns. Specifically, EPA has committed financial resources to cover the initial test method validation work and has already reached out to states and stakeholders to discuss this work.
- Because this is a technically complex undertaking that is expected to take several years to complete, the agency will in the meantime be taking steps to provide relief to wood heater manufacturers and retailers so that they are not forced to make inefficient – and possibly, ineffective – use of their resources in the interim. Many wood heater manufacturers are small businesses and may, as a consequence, find themselves particularly burdened by the 2015 rule.

Proposed Rulemaking

- The wood heating devices addressed in this proposal include units that meet standards known as Step 1. Step 1 is already in effect and requires that units meet emission limits for particle matter (PM). This proposal would add a two-year period to allow retailers to sell the Step 1 compliant hydronic heaters and forced-air furnaces (and, perhaps, wood stoves) through May 2022. This change is called a “sell-through.”
- EPA is seeking comment on the proposed amendments, including:
 - A two-year “sell-through” period for retailers of Step 1 certified wood-burning hydronic heaters and forced-air furnaces included in the 2015 standard.
 - Whether to provide additional time for retailers to sell existing inventory of wood stoves and pellet stoves and if so, how much time.
 - Whether the current minimum requirements for pellet fuel should be kept the same or revised.

Advance Notice of Proposed Rulemaking

- Through an Advance Notice of Proposed Rulemaking, or ANPR, EPA requests comment on several aspects of the 2015 NSPS, including:
 - Compliance date for the Step 2 PM limits
 - Step 2 PM limits for forced-air furnaces, hydronic heaters, and wood stoves
 - Step 2 PM limits based on weighted averages versus individual burn rates
 - Transitioning to cord wood certification test methods

- Compliance audit testing
- Third-party review
- Electronic reporting
- Warranty requirements

BACKGROUND

- Wood burning heaters (also referred to in the proposal as wood heating devices) include wood stoves, pellet stoves, hydronic heaters and forced-air furnaces that burn pellets or other types of wood for heat. Residential units affected by this proposed rule and notice are new manufactured:
 - Wood and pellet stoves
 - Forced-air furnaces
 - Hydronic heaters
- Wood smoke is made up of a mixture of gases and fine particles that are produced when wood and other organic matter burns. The particles in smoke – also called particle pollution or PM – can get deep into the lungs, harming the lungs, blood vessels and heart. People with heart, vascular or lung disease, older adults and children are the most at risk.
- Smoke from residential wood heaters can increase particle pollution to levels that pose serious health concerns. In some areas, residential wood smoke constitutes a significant portion of the particle pollution problem.
- The Clean Air Act requires EPA to set new source performance standards (NSPS) for categories of stationary sources of pollution that cause, or significantly contribute to, air pollution that may endanger public health or welfare. The law requires EPA to review these standards every eight years.
- EPA issued the first NSPS for residential wood heaters in 1988. That rule applied only to adjustable burn-rate wood stoves, including a type of adjustable burn-rate wood stove known as a fireplace insert. Since that time, technology for reducing emissions from wood heaters has significantly improved and is available to make new units less polluting.
- The Agency amended the standards in 2015. The 2015 standards included a phase-in of requirements to build cleaner stoves that meet a more stringent standard. The final requirements, known as new source performance standards, or NSPS, update PM emission limits for newly manufactured adjustable-rate woodstoves and set the first federal air standards for several other types of wood heaters: pellet stoves; indoor and outdoor wood-fired hydronic heaters; wood-burning forced-air furnaces; and a type of previously unregulated woodstove known as a “single burn-rate” stove.

HOW TO COMMENT

- EPA will take public comment on the proposed rule for 45 days and for the advance notice of proposed rulemaking for 75 days after they are published in the Federal Register. There

are multiple ways to submit written comments. Please use one of the methods below to ensure EPA receives your comments.

- The Docket ID number for the proposed rule is EPA-HQ-OAR-2018-0195 and for the advance notice of proposed rulemaking it is EPA-HQ-2018-0196.
- Label your comments with the Docket ID number, then submit them by any one of the following methods:
 - Online - go to www.regulations.gov and type the Docket ID number above in the search box. Click on the “Comment Now!” button at the top right of the page and follow the instructions for submitting your comments.
 - E-mail: Send comments by e-mail to a-and-r-Docket@epa.gov, Attention Docket ID EPA-HQ-OAR-2018-0195 or EPA-HQ-OAR-2018-0196. Please include the docket number in the subject line of your email message.
 - Fax: You may fax your comments to: (202) 566-9744, Attention Docket ID. No. EPA-HQ-OAR-2018-0195 or EPA-HQ-OAR-2018-0196.
 - NOTE: Confidential Business Information (CBI), or other information that is subject to disclosure restrictions by law, should never be sent to EPA electronically. If you have questions about submitting CBI or other information subject to disclosure restrictions by law, please visit <http://www2.epa.gov/dockets/commenting-epa-dockets> for additional information.
 - Mail: You may mail your comments to Environmental Protection Agency, EPA Docket Center (EPA/DC), Mail Code 28221T, Attention Docket ID No. EPA-HQ-OAR-0195 or 0196, 1200 Pennsylvania Avenue, NW, Washington, DC 20460.
 - Hand delivery/courier delivery: Comments may be delivered to EPA Docket Center, Room 3334, EPA WJC West Building, 1301 Constitution Ave., NW, Washington, D.C. 20004, Attention Docket ID No. EPA-HQ-OAR-2018-0195 or EPA-HQ-OAR-2018-0196. Please note that hand/courier deliveries are only accepted during the Docket’s normal hours of operation, and special arrangements should be made for deliveries of boxed information.

For tips on submitting comments, see <https://www.epa.gov/dockets/commenting-epa-dockets>

FOR MORE INFORMATION

- EPA’s Burn Wise program provides a wealth of information to help consumers ensure wood heaters burn as cleanly and efficiently as possible. For more information, visit: <http://www.epa.gov/burnwise/bestburn.html>.
- Today’s proposed rule and additional background information is available at: <https://www.epa.gov/residential-wood-heaters>.