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January 14, 2019

Andrew Wheeler
Acting Administrator
Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Re: RIN 2060–AU00 - Standards of Performance for New Residential Wood Heaters,
New
Residential Hydronic Heaters and Forced-Air Furnaces

Acting Administrator Wheeler:

On behalf of the 16,000 members of the American Thoracic Society, I want to express our strong concerns with the Environmental Protection Agency's proposal to extend the transition deadline for new source performance standards for new residential wood heaters, hydronic heaters and forced-air furnaces. The proposed extension of the implementation deadline is bad for the environment and will have an adverse impact on human health. We strongly urge the agency not to finalize the proposed deadline extension.

Wood heaters are a source of hazardous air pollutants and it is appropriate for EPA to regulate emissions from wood-fire heaters and furnaces. The rule-making process on wood heaters and furnaces that was finalized in 2015 provided appropriate background information on the pollution emitted from wood heaters and furnaces and the health impacts exposure to wood smoke causes. The ATS supports the underlying rule that was finalized in 2015 and urges the agency to move forward with its timely implementation.

We note with concern that EPA's own analysis that the proposed delay implementation of wood heater rule shows that delay would have a negative total economic impact on the U.S. economy. The 2015 final rule for wood stoves and heaters was estimated by EPA to produce an economic benefit of \$100 dollars for each \$1 of implementation costs. For the proposed rule under consideration, EPA has taken a number of steps to intentionally, and in our opinion, inappropriately, reduce the economic benefits yield from implementation of the 2015 rule. Even with biased analysis of the proposed rule under consideration, EPA analysis estimates the foregone environmental benefits caused by delayed implementation of the 2015 rule outweigh industry savings by 10 to

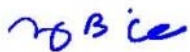
20 times. EPA's proposal to move forward with delayed implementation of the 2015 rule undermines the Administration's claims of supporting costs effective regulatory policy.

The industry has had sufficient time to meet the 2015 standards. We note the 2015 rule is an update of the previous rule finalized in 1988. Significant technology advance occurred in the over 25 gap between the two performance standards. The 2015 final rule provided significant flexibility and transition time for manufacturers, including a 5 year sell through window to sell Phase 1 compliant systems. Further, the market is already adjusting to meet the Phase 2 standards. There are over 80 pellet, catalytic and non-catalytic wood stove models already certified as meeting Phase 2 standards. The current availability of Phase 2 models clearly shows that there is no justification for the proposed delays in implementation of the 2015 standard.

More importantly, the proposed regulation would delay the real, measurable and important health benefits that will be enjoyed by the public by requiring more efficient and less polluting wood heaters and furnaces be made available on the U.S. market. Wood smoke is an important source of dangerous air pollutants including CO, NOx, benzene and particulate matter. In many communities, wood stoves and furnaces are a significant source of winter time particulate matter emission. Exposure to wood stove and furnace emissions can cause serious health effects including asthma exacerbations, emergency room visits and hospitalizations, increase controller medication use, heart attacks, COPD exacerbations and hospitalizations. Delaying implementation of the 2015 rule will deny patients living in areas that rely on wood stoves and furnaces of the important health benefits of reduced wood smoke pollution emissions that will be achieved by the standard.

We respectfully urge the Administration to abandon the proposed delay and instead move forward with timely implementation of the wood heater and furnace new source performance standard rule.

Sincerely,

A handwritten signature in blue ink that reads "Mary Rice".

Mary Rice MD MPH
Chair, ATS Environment Health Policy Committee
American Thoracic Society