



May 5, 2014

Administrator Gina McCarthy  
U.S. Environmental Protection Agency  
Air and Radiation Docket and Information Center  
Mail Code: 2822T  
1301 Constitution Avenue, N.W.  
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OAR-2009-0734

Re: *Proposed Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters*

Dear Administrator McCarthy:

The Connecticut Department of Energy and Environmental Protection (DEEP) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA's) proposed *Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces, and New Residential Masonry Heaters* (79 FR 6330, February 3, 2014).

DEEP supports EPA's proposal to update the New Source Performance Standard (NSPS) for residential wood-fired heaters. Connecticut continues to experience winter-time exceedances of the PM<sub>2.5</sub> national ambient air quality standard 24-hour value of 35µg/m<sup>3</sup>, and wood smoke contributes to those exceedances. An ambient air monitoring study conducted by DEEP in Connecticut from September 2006 through April 2008 has shown that wood smoke contributes an average of 36.3 % of the hourly PM<sub>2.5</sub> concentrations. However, on cold winter days when ambient concentrations of PM<sub>2.5</sub> are elevated, observed wood smoke contributions to hourly PM<sub>2.5</sub> were as high as 56.8%.<sup>1</sup> Wood-burning devices also emit carbon monoxide, volatile organic compounds, and hazardous air pollutants. Since these pollutants are emitted near ground level in residential communities, human health impacts from exposure to wood smoke can be high. Adopting and implementing the proposed rule will help protect the health of Connecticut residents as existing, dirtier wood heaters are replaced with heaters that meet the proposed emission standards.

Wood heat technology has advanced since EPA's existing standards were promulgated in 1988. DEEP, therefore, endorses EPA's proposal to enact more stringent emission standards that reflect limits that are readily achievable by today's best units. Further, the emissions from indoor/outdoor hydronic heaters have become a nuisance in many areas. Since these devices are

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<sup>1</sup> *Evaluation of Wood Smoke Contribution to Particle Matter in Connecticut* - February 2011 (Docket ID: [EPA-HQ-OAR-2009-0734-0149](#))

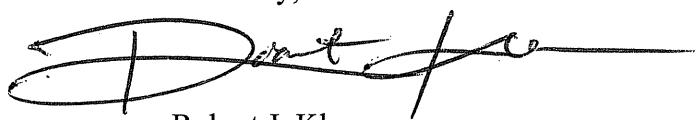
unregulated by current EPA regulations and emit pollutants at much higher rates than certified stoves, many nuisance related complaints are submitted to DEEP each year. Thus, DEEP strongly supports EPA's expansion of the applicability to include indoor/outdoor hydronic heaters and forced-air furnaces, and the prohibition of the sale on uncertified devices after the compliance date. DEEP also supports the proposal to include single burn rate stoves, all pellet stoves and masonry heaters.

DEEP favors EPA's preferred two-step compliance approach over the alternative three-step, eight-year approach. However, we question whether a compliance window of five years is necessary given that the proposed final standards are now met by top industry performers. The full benefit of this rule will not be realized for many years, perhaps decades, because of the long life-span and slow turnover of these devices. Installation of devices meeting less stringent standards has long-term air quality and health impacts. Therefore, expeditious adoption of the final emissions standards will result in long-term air quality and health benefits for Connecticut residents.

DEEP agrees that EPA should regulate the manufacturers of wood-burning heaters by promulgating national emissions standards, while allowing states and local agencies to regulate other issues, such as siting and installation requirements, to address local air quality concerns and reduce impacts on neighboring properties.

If you have any questions regarding this letter, please contact Ric Pirolli of my staff at (860) 424-4152.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Klee", with a long horizontal flourish extending to the right.

Robert J. Klee  
Commissioner

cc. David Conroy, EPA, Region 1