

April 21, 2010

Joyce E. Epps, Esquire
Director, Bureau of Air Quality
Department of Environmental Protection
P. O. Box 8468
12th Floor Rachel Carson State Office Building
Harrisburg, PA 17105

Dear Ms. Epps:

On March 16, the CAC Air Committee met with BAQ staff to discuss comments received on the proposed Outdoor Wood Burner regulations. At the time, the department was still in the process of reviewing the comments, including just-received comments from the IRRC, but it was clear that the comments ran the gamut from support to opposition.

These proposed regulations are intended to address an emerging issue which poses real quality of life and public health concerns—outdoor wood burners (OWBs). OWBs, which are being used to heat homes and buildings and to produce domestic hot water, allow users to manage their heating costs. However, they are a significant and growing source of PM_{2.5} emissions.

DEP reports that stack tests conducted by the Northeast States for Coordinated Air Use Management indicate that the average PM_{2.5} emissions from one OWB are equivalent to the emissions from 205 oil furnaces or as many as 8,000 natural gas furnaces. Even the smallest OWB has the potential to emit almost 1 1/2 tons of PM annually.

The health effects associated with exposure to PM_{2.5} are significant. DEP reports that epidemiological studies show a significant correlation between elevated PM_{2.5} levels and premature mortality. PM_{2.5} exposure can also aggravate respiratory and cardiovascular disease (as indicated by increased hospital admissions, emergency room visits, absences from school or work and restricted activity days), decrease lung function, and trigger asthma attacks and certain cardiovascular problems. Sensitive populations include older adults, people with heart and lung disease and children.

Unlike indoor wood stoves that are regulated by the EPA, no Federal standards exist for OWBs and most are not equipped with pollution controls. EPA is in the second phase of a voluntary program that encourages manufacturers of OWBs develop cleaner-burning, more efficient OWBs. To qualify for a Phase 2 Partnership Agreements (initiated in late 2008), manufacturers must develop an OWB model that meets the EPA air emissions standard of 0.32 pounds PM per million Btu heat output as tested by an independent

accredited laboratory. DEP's proposed rulemaking would establish this same emission standard and would help drive the development and use of cleaner-burning, more efficient OWBs..

The proposed rulemaking would help Pennsylvania in attaining and maintaining levels of PM2.5 below the health-based NAAQS; this is important to reduce premature mortality and other health effects associated with PM2.5 exposure. It would also address citizen complaints re: the operation of OWBs and address quality of life and nuisance concerns such as smoke, odors and burning prohibited fuels including garbage and tires.

The emissions, health effects and the nuisance factor created by the use of OWBs are a major concern and need to be addressed by the Department. The Air Committee urges DEP to seek an approach that is responsive to the concerns raised and proceed with a final regulation that protects the citizens of the Commonwealth.

Thank you for your consideration of our comments. Please contact Sue Wilson, Council's Executive Director, at 717-787-4527 if you have any questions.

Sincerely,

John Walliser, Esq.
Chair
CAC Air Committee

cc: AQTAC
Michele Tate