

EQB SUMMARY WOOD FIRED BOILERS

The Sierra Club, Pennsylvania Chapter supports the regulation controlling emissions from new outdoor wood fired boilers in Pennsylvania that is proposed in 39 Pa. B.6068, with additions; 40,000 uncontrolled OWBs are predicted in PA by 2010, with obvious implications for continued or even increases in PM nonattainment in Pennsylvania;

Many Complaints include smoke, odors, the burning of prohibited fuels, garbage, tires, electronics and hazardous waste such as foam and other plastics; a cyclic operating process creating an on/off burn cycle plus incomplete combustion of the wood fuel can release carcinogenic benzene, formaldehyde, dioxin, and polycyclic aromatic hydrocarbons in addition to PM 2.5;

uncontrolled OWB PM2.5 emissions are equivalent to 205 oil burning furnaces and 8000 natural gas furnaces. The smallest OWB on the market has the potential to emit one and one half tons of PM2.5 each year;

state regulatory action involving OWBs would ensure increased protection of human health from PM 2.5, smoke and toxic pollutant exposures, mediate acute episodes of locally drastically reduced visibility, reduce the pollution load, alleviate the need for a patchwork of local municipal controls across Pennsylvania, alleviate the local cost of developing and enforcing municipal ordinances, and reduce the certainty that some PA counties will trigger new PM 2.5 nonattainment in the near future, due to uncontrolled or under-controlled OWB emissions.

The Sierra Club suggests that Pennsylvania's regulation should include provisions to phase-in controls on existing units, provide seasonal protection from OWB emissions by prohibiting units from being used between April 1 - October 31 in Pennsylvania PM 2.5 nonattainment areas and in any population center that is a village, town, borough or city;

the regulation should prohibit OWB owner/operators along the state boundaries from burning within 500 feet of the boundary line of a residence, nursing home, hospital, day care center or school in another state;

In Pennsylvania, do the same; protect those residing in nursing homes and hospitals, and those attending schools and day care centers;

PADEP should fund an education program for existing OWB owner/operators to explain the hazards of uncontrolled emissions, and the benefits of controlling OWB emissions;

spell out within the definition of clean wood that there is no contamination allowed by any toxin listed by the federal government within the Clean Air Act, Clean Water Act, RCRA or Superfund, or any other applicable federal or Pennsylvania state law, such as the PA Air Pollution Control Act;

In conclusion, PADEP's analyses of costs associated with compliance show a very reasonable and affordable solution to the growing OWB problem.

[1] NESCAUM. Northeast States for Coordinated Land Use Management. 2009. *Outdoor Wood Boiler Fact Sheet*.

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