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**Testimony of Tanya Dierolf, Central Pennsylvania Outreach Coordinator  
for Citizens for Pennsylvania's Future (PennFuture)  
on the proposed rulemaking on outdoor wood-fired boilers  
November 30, 2009**

My name is Tanya Dierolf. I am the Central Pennsylvania Outreach Coordinator for PennFuture. I work here in our Harrisburg office. I am here to testify in support of DEP's proposed regulation of outdoor wood-fired boilers. PennFuture supports the rule, and we urge the Department and the Environmental Quality Board to move forward to protect neighbors and the wider community from pollution from these boilers.

Outdoor wood boilers are used to provide heat and hot water to nearby buildings, typically homes. Scientific studies cited by the US EPA report potentially serious adverse health effects from breathing smoke from these boilers. EPA cites fine particle and toxic air pollution as the source of these health effects. Fine particle pollution is linked to asthma, reduced lung function, heart problems, and premature death in people with heart and lung disease.

Around Pennsylvania, neighbors downwind of outdoor wood boilers are at risk of these health effects, as well as nuisances such as odors and smoke. PennFuture has heard from these neighbors. In extreme cases, neighbors stay inside in the summer with the windows closed to escape the effects of nearby wood boilers. Municipal response to these problems has been inadequate. These neighbors need DEP's help.

The wood boilers also have a harmful effect on wider air quality in Pennsylvania. Part or all of 21 Pennsylvania counties fail to meet EPA's 1997 standard for fine particles,

with more protective federal standards to come. According to a 2006 report by the Northeast States for Coordinated Air Use Management, average fine particulate emissions from one outdoor wood boiler were equivalent to emissions from 22 EPA certified wood stoves, four heavy duty diesel trucks, 205 oil furnaces, or up to 8,000 natural gas furnaces. With the challenges we face, DEP must look to wood boilers for emission reductions.

The proposed rule includes a number of provisions that will help reduce emissions and protect neighbors:

- The proposal requires new units to meet EPA Phase 2 requirements. This is a voluntary national program that reduces emissions by 90% in comparison to units not meeting EPA requirements.
- The proposal requires new Phase 2 units to be set back from property lines.
- The proposal requires all units to meet minimum stack heights.
- The proposal prohibits fuel other than clean wood and wood pellets made from clean wood. It also allows home heating oil, natural gas, or propane as a starter or supplemental fuel.

The preamble to the proposal seeks comment on whether a final rule should include a seasonal prohibition on operation of wood boilers between May 1 and September 30 of each year. Since this is a time when many neighbors have their windows open, and the need for heating by wood boilers is reduced, PennFuture supports the provision.

We believe the proposed rule offers flexibility. Subject to some conditions, the rule allows the continued use of older wood boilers. The rule includes a mechanism for Department approval of additional fuels. The rule does not apply to units sold in Pennsylvania for shipment and use outside Pennsylvania.

We support adoption of the wood boiler rule. But we note that adoption of this rule will not end the challenges regarding wood boilers. In these tough budget times, DEP will need to develop an enforcement strategy that leverages the resources of other agencies. We look forward to assisting DEP in the effective implementation of this rule to protect neighbors, and to improve air quality for all Pennsylvanians.