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INDEPENDENT REGULATORY
REVIEW COMMISSION



ALLIANCE
FOR GREEN HEAT
clean, renewable & local

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December 24, 2009

Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105 -8477

DEC 29 2009

ENVIRONMENTAL QUALITY BOARD

Dear Board of Environmental Quality,

As a national organization dedicated to promoting wood heat in America, we strongly urge you to adopt strict regulations for outdoor boilers. We believe that wood heat should be a key source of renewable energy in America, and that renewable energy incentives should be provided to biomass, along with solar, wind and geothermal. However, we also believe that the EPA has let our emission standards stagnate and has allowed too many exempt appliances, such as outdoor boilers, to remain on the market for too long.

Pennsylvania's proposed regulations of requiring Phase II units, 150 setback from property lines and minimum stack height of 10 feet above the ground and two feet above nearby residences are completely reasonable.

Even further setback requirements should be in place near schools, hospitals and densely inhabited areas.

One of the most important facts to recognize is that Phase II boilers only cost marginally more than many unregulated boilers. Some Phase II boilers cost only 15 percent more. That is a small price to pay for cleaner air.

Another key point is that while setbacks will help protect neighbors, they do nothing to protect families that own outdoor boilers, especially children who have no say where they live and what they breathe. Children are particularly vulnerable to the harmful effects of wood smoke.

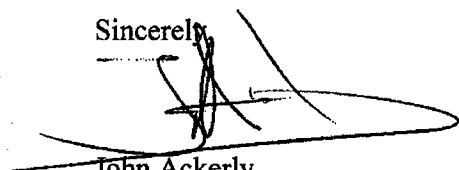
Unfortunately, one of the biggest problems with outdoor boilers is with the existing boilers, not the new ones meeting new requirements. Requiring both new and existing boilers to meet the stack height restrictions is important. We believe both new and existing outdoor boilers should be prohibited from use during the summer, except for boilers that use wood pellet fuel, which are reliably much cleaner.

A modest setback requirement of 50 feet from an inhabited dwelling on neighboring property should also be required of existing boilers, except in cases of extreme hardship. If necessary, some funding could be provided to families who cannot afford to do this. Again, this should not be required of pellet boilers.

Exempt wood stoves should not have to conform to any emission standards. Exempt wood stoves are those that have a firebox volume of less than 20 cubic feet, an air to fuel ratio of less than 35-to-1, a burn rate of less than five kilograms per hour and a total weight of less than 800 kilograms. Hundreds, if not thousands, of these stoves are installed in Pennsylvania every year. They are heavily advertised, as are outdoor boilers, on Web sites, and consumers often have no idea that these stoves are not EPA certified. The most common brand is Vogelzang and models sell for \$195 to \$400. We would be happy to submit more information about these. While they do not emit the volume of smoke that outdoor boilers do, they pose a greater risk to indoor air quality because they are not airtight.

Thank you for undertaking this process that, we hope, will lead to reasonable regulations of a very polluting appliance. If wood heat plays a vital role in our society, as we believe it should, we have to promote cleaner appliances and ensure that wood smoke is restricted to reasonable levels.

Sincerely,



John Ackerly,
President



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**Not All Outdoor
Wood Boilers are
Created Equal**

Opening the last two issues, we were taken aback to see advertisements for outdoor wood boilers. Some outdoor wood boilers are fairly clean and efficient, but most states in the United States allow even the dirtiest, most polluting models to be installed. Your readers should know the difference.

Unregulated outdoor wood boilers are the scourge of the clean wood-burning movement, and continue to give wood burning a bad name. Only recently has the U.S. Environmental Protection Agency (EPA) set standards for outdoor wood boilers, so if you buy one, no matter what state you live in, make sure the boiler is

Phase II EPA certified. You will be doing the environment, your neighbors and yourself a huge favor. Better yet, look into an indoor wood furnace or boiler, which are smaller and generally much more clean and efficient.

Efficient models will save you thousands over the unit's lifetime because they use much less wood to make the same amount of heat—saving you countless trips to the wood pile. (See "Wood Heat: Is it Right for You?" on Page 54.)

Wood can be a fantastic renewable, low carbon and local fuel source. As with all renewables, Europe is decades ahead of us in developing wood as a mainstream, clean energy source. In parts of Austria, for example, installing a fossil fuel furnace is strongly discouraged or even disallowed because their pellet furnaces are so efficient and clean. While the EPA was allowing sales of unregulated outdoor wood boilers to flourish, Europeans were investing in R&D and incentives to develop products that

heat entire communities without the air quality concerns inherent to outdoor wood boilers.

This is a great year to buy or upgrade your woodstove or furnace. The federal government is giving a 30 percent tax credit, up to \$1,500, for high efficiency certified woodstoves and furnaces. And many states offer additional tax incentives. For more details on the federal and state incentives, go to www.forgreenheat.org.

*John Ackerly
Takoma Park, Maryland*



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Stoves that are Exempt from EPA Emission Standards December 2009

Among the categories of wood burning appliances that are exempt from EPA standards, are cook stoves, coal stoves, pellet stoves, masonry stoves -- and wood stoves that "possess an air to fuel ratio of 35 to 1, a burn rate of 5kg per hour, a firebox volume no more than 20 cubic feet and with a total weight of less than 800 kilograms. Wood heating appliances that do not meet this criteria are exempt from the EPA wood stove regulations."

The result of this exemption is that tens of thousands of cheap, highly polluting wood stoves are being sold every year in America. Most of them are made in China and specifically designed so that they do not reduce emissions so that they can remain exempt. Since they are by far the cheapest stoves available in America, they are very popular. One industry expert estimated that 100,000 exempt wood stoves are sold every year, 130,000 EPA certified wood stoves and 100,000 pellet stoves (based on a 3 year running average.)

If you go to Amazon.com and type in "wood stove" typically 5 out of 6 of the first stoves that appear are exempt. Half of them are usually made by the Vogelzang company. These cheap exempt stoves are heavily marketed on the internet but also readily available in major hardware chains like Ace and Aubuchon. (Home Depot and Lowe's only sell one exempt stove.) For example, on the Aubuchon site,

<http://search.hardwarestore.com/Default.aspx?query=wood+stove&tld=4221>, of the 16 items under "wood stove" 9 of them are exempt (including 2 barrel kits). They also sell 4 large capacity Circulator stoves, <http://search.hardwarestore.com/?query=wood%20stove&tld=4222>, for \$750 - \$900 that burn wood and coal, all of which are exempt and designed to use on a low heat setting. These may bear some resemblance to a living room OWB.

Only two states in the US have banned the installation of these: Washington and California. Denver has also banned them, and a pending bill in Rhode Island would ban them from densely populated areas. Our web site has some more info on this: http://www.forgreenheat.org/policy/state_policy.html. There is not even a suggestion that these stoves should not be installed in non-attainment areas.

We have been urging EPA, states and cities engaged in change out programs to ban installation of these exempt stoves or else the resources put into the change out will be undermined as more and more exempt stoves are installed. We feel that the EPA should require states or cities to do that in order to receive federal



money for change outs. In the recent Vermont change out, some people received a \$450 voucher by turning in a Vogelzang stove that cost less than that when it was purchased new.

We understand from EPA that most of these exempt stoves will be likely required to comply with EPA emission standards in 4 - 5 years once the NSPS review is completed. Some in the wood stove industry may succeed in delaying that timetable through litigation. Regardless, hundreds of thousands of these stoves will be sold and installed before then, creating even worse wood smoke problems in current non-attainment areas.

Banning exempt appliances and requiring them to conform to emission standards would be a significant step towards leaving America's 19th century wood burning practices behind.