

Dear Environment Committee of the State of Connecticut,

I respectfully offer the following the comments regarding proposed Bill No. 84 "An Act Concerning Outdoor Wood Furnaces":

As I'm sure you know, both outdoor ***and indoor*** wood furnaces are currently unregulated by the EPA. Over 20 years ago when the EPA did New Source Performance Standards for residential wood stoves they created a loophole. Both Oregon and Washington States have closed this loophole by requiring ALL residential wood burning devices to meet the EPA wood stove requirements. I strongly urge the State of CT to do the same.

Bill 84 is missing the very important growing issue of the use and sale of INDOOR boilers which have same "design" issues. Bill 84 also is still ignoring the fact that distance will NOT eliminate the pollution to the airshed and the emissions. Unless or until manufacturers supply air to the fire and have separate water storage it is going to be very difficult to get complete combustion that eliminates the PM 2.5, PAHs, VOCs, and carcinogens.

I commend CT for taking some steps w/Legislation which NY has not yet done, but ***you need to get it right by closing all loopholes*** --- in addition to not allowing boilers that do not meet at least the indoor wood stove EPA requirements you are setting CT up to not meet NAAQS which are under review for further tightening. ***Bill 84 needs to be severely amended and adopt the Oregon standard AND include strong nuisance standards to assist the State and Local Gov'ts in shutting down existing wood boilers that are very severely compromising people's health.***

Below are the links to the ORegon Legislation and related documents.
Oregon Legislation

- <http://www.leg.state.or.us/09reg/measpdf/sb0100.dir/sb0102.en.pdf>

Oregon Implementation Documents

- <http://www.deq.state.or.us/about/eqc/agendas/attachments/2010apr/O-HeatSmart.pdf>
- <http://www.deq.state.or.us/aq/burning/docs/heatsmart/relationshipFederalReg.pdf>
- <http://www.deq.state.or.us/aq/planning/docs/0709meeting/WoodstoveIncentives.pdf>
- <http://www.deq.state.or.us/aq/burning/woodstoves/heatSmart.htm>

Everyone that lives downwind of OWB/IWBs have waited a long time for gov't to correct this very serious EPA oversight. Method 28 is not real world burning and so the Phase II Voluntary boilers are not the answer. EPAs draft NSPS will extend the nightmare for decades so CT needs to do the right thing by their citizenry.

Good luck. We in NY know what a nightmare this is. Our air cannot afford the pollution emitted by these devices.

Thank you,
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