

Connecticut Association of Directors of Health

Testimony in Opposition to Raised Bill No. 1134: An Act Concerning Outdoor Wood-Burning Furnaces
To the Distinguished Co-Chairs and Members of the Environment Committee
March 22, 2013

Good afternoon, distinguished co-chairs and members of the Environment Committee. My name is Karen Spargo, President of the Connecticut Association of Directors of Health (CADH) and Director of Health of the Naugatuck Valley Health District, serving the towns of Ansonia, Beacon Falls, Derby, Naugatuck, Seymour and Shelton.

CADH opposes *Raised Bill No. 1134: An Act Concerning Outdoor Wood-Burning Furnaces* (“OWFs”) because (1) the bill does not go far enough to adequately protect the public’s health and (2) because local health directors should only enforce laws relating to OWFs through the nuisance section of the Public Health Code.

The scientific literature concludes that volatile organic compounds and small particulate matter, such as wood smoke, endanger the health of those exposed. Potential adverse health outcomes from exposure include increased coughing and difficulty breathing; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.¹ Smoke generated by OWFs is uniquely harmful, relative to smoke generated by other wood-burning activities. The basic design of OWFs causes fuel to burn incompletely, often resulting in thick smoke and high particulate emissions. Moreover, unlike other wood-burning activities, OWFs burn continuously, further elevating the extent of particulate emissions. In short, wood smoke from OWFs presents a significant public health threat, one that can only be sufficiently addressed through a complete ban on OWFs.

Of additional concern, local health directors are not the appropriate enforcers of technical restrictions on the use or sale of OWFs. Local health directors have neither the expertise nor the resources to enforce the technical requirements of this bill as drafted. For example, local health directors are not equipped to evaluate whether or not wood is “clean wood,” as defined in Section 1(a) of this bill. Local health directors currently investigate every OWF complaint under the authority provided by Section 19-13-B2 of the Public Health Code and Section 19a-206 of the Connecticut General Statutes. Even units that meet the separating distance and stack height requirements under current law² are included among these reports. The current requirements are not only insufficient to protect the public’s health from OWF emissions but also significantly challenge the resources of local public health departments, which must investigate every complaint. The authority to enforce technical restrictions on the use of OWFs lies with the Department of Environmental Protection, which in partnership with the Department of Public Health recently articulated guidance to local health directors on investigating wood smoke complaints. The authority to enforce restrictions on the sale of certain OWFs resides with the Department of Consumer Protection, not local public health.

Requiring OWFs to comply with the U.S. Environmental Protection Agency’s Voluntary Phase 2 Standards is a step in the right direction, but it does not go far enough to adequately protect the public’s health, nor are local health directors the appropriate enforcers of this raised bill’s provisions. Accordingly, CADH opposes *Raised Bill No. 1134: An Act Concerning Outdoor Wood-Burning Furnaces* (“OWFs”). CADH is a nonprofit organization comprised of Connecticut’s 74 local health departments and districts. Since its incorporation in 1996, CADH has and continues to convene, engage, mobilize, and support Connecticut’s local health departments and districts to strengthen and assure efficient and effective delivery of public health services. Local health directors are the statutory agents of the Commissioner of Public Health and are critical providers of essential public health services at the local level in Connecticut. Thank you for your consideration.

¹ Environmental Protection Agency. *Health Effects of Breathing Woodsmoke*. Available at <http://www.epa.gov/burnwise/pdfs/woodsmoke_health_effects_jan07.pdf>. Accessed March 21, 2013.

² Conn. Gen. Stat. Section 22a-174k(b).