



Statement of Central Boiler Regarding Senate Bill 66
Environment Committee
February 18, 2014

Sen. Meyer, Rep. Gentile, Sen. Chapin, Rep. Shaban and members of the committee:

Central Boiler is pleased to offer comments about SB 66, *An Act Concerning Outdoor Wood Furnaces*. As the committee knows, our company manufactures OWFs and other products for consumers in Connecticut and throughout the nation.

Over the past seven years, Central Boiler and dealers have made repeated proposals for change that we believe would make the system work better in Connecticut. We've met with the co-chairs of the Environment Committee and many legislators in an attempt to be part of the solution. We offered, for instance, a proposal four years ago (and every year since) to put a limit on particulate matter emissions from any new OWF sited in the state. We've also been advocating better enforcement of the smoke nuisance provisions of the Public Health Code by municipalities and the state as a way to reduce complaints on problem OWFs. We've also endorsed better consumer information and protections. Although legislation has not passed on OWFs in a number of years, we will continue to advocate for changes that we believe will work to everyone's advantage.

Central Boiler supports the provisions in SB66 that establish proper fuel use requirements and to keep installation requirements in place even after the NSPS is promulgated in 2015. However, as previously represented, Central Boiler feels that installation requirements should reflect the level of control that NSPS OWFs expects to achieve over 'conventional' OWFs.

Vermont was the first state to regulate outdoor wood furnaces (OWFs) beginning in 1997, followed by the State of Connecticut in 2005 through *Public Act 05-227*.

Many northeast States including Connecticut's neighbors (New York, Massachusetts, and Rhode Island) updated regulations based upon work done in EPA's Hydronic Heater Voluntary Partnership Programs (Phase 1 and/or just Phase 2). The EPA, manufacturers, state air agencies including the CT DEEP, test laboratories and other stakeholders all participated in this process. The EPA Phase 2 Program particulate matter emissions limit is 0.32 lbs/MMBtu heat output. Efficiency is built into the output based emission limit and the EPA states that "*Phase 2 units have an orange and white tag and are about 90 percent cleaner than unqualified units.*"

NESCAUM, of which the CT DEEP is a member state agency, issued a Model Rule in 2007 to address the OWF regulatory matter at the state and local level. The NESCAUM Model Rule, with the EPA providing funding, established the same particulate matter emission limit (0.32 lbs/MMBtu heat output) as EPA's Phase 2 Program. It also establishes test methods that are actually applicable to OWFs and states, "*The model regulation is intended to assist government agencies in enacting their own regulations... The purpose of the model rule is to promote cleaner outdoor units through common standards across the states that will protect air quality and public health while reducing the compliance burden on manufacturers...*"

All Central Boiler dealers in Connecticut offer Connecticut consumers the ability to purchase EPA Phase 2 Qualified Hydronic Heaters and well over 100 consumers have already purchased these appliances without being directed or required to by the State.

Central Boiler's supports establishing test methods that are actually applicable to OWFs along with emission limits that are applicable to OWFs (0.32 lbs/MMBtu heat output). But Central Boiler does not support bans on OWFs installed in compliance with Connecticut state law. Furthermore, we will aggressively advocate against proposals that seek to essentially ban OWFs through a guise of emission limits and test methods that are unreasonable and impractical or not even applicable to Hydronic Heaters.

Thank you again for the opportunity to discuss the issue of Outdoor Wood Furnaces. We at Central Boiler believe we have offered reasonable ideas for resolving this controversy and we are prepared to do so once again in the 2014 session.

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