



**REGIONAL AIR POLLUTION CONTROL AGENCY**

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April 19, 2010

Carolina Prado  
Ohio Environmental Protection Agency, DAPC  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

RE: Comments on Draft Language for Ohio Administrative Code (OAC) Chapter 3745-17-01, "Definitions," and 3734-17-09. "Restrictions on particulate emissions and odors from incinerators".

The following comments are provided on behalf of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio in response to Ohio EPA's proposed draft language for Ohio Administrative Code (OAC) Chapter 3745-17-01 and 3745-17-09. RAPCA is one of nine local agencies in Ohio and is responsible for air quality activities in the six Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble.

In recent years, rising fuel prices have raised the popularity of wood-fired boilers (OWB) throughout Ohio, thus such boilers are becoming more common in suburban settings. Unfortunately, none of these units are equipped with air pollution control devices and few are engineered to burn cleanly. OWBs can emit a significant amount of particulate matter in the form of wood smoke. Wood smoke contains a variety of air toxins that can pose a health risk to residents living near these units and can contribute regionally to ambient particulate matter levels.

While RAPCA appreciates the necessity for affordable, reliable energy, we firmly believe that the operation of OWB's should not negatively impact neighboring properties or surrounding communities.

Unlike wood stoves, which must meet federal standards, OWBs have no such standards, are not engineered for good combustion, and do not use control devices such as wood stoves employ. OWBs present unique problems since they are designed for year-round operation, typically have stack heights of less than 12 feet from the ground, and use a large firebox. A short stack height results in minimal dispersion of emissions and a greater impact on neighbors,

in relation to a wood stove. The large firebox allows for burning of inappropriate material, such as green wood and trash.

While U.S. EPA has recognized the problems associated with OWBs, the agency has determined that state and local regulations will be more effective and timely than national regulations. In the absence of any formal U.S. EPA action, it is imperative that states such as Ohio adopt regulations that protect the public's health.

RAPCA currently has three counties currently designated as non-attainment for the annual PM<sub>2.5</sub> standard. Therefore, it is important to limit emissions from these units and regulate their operation and placement.

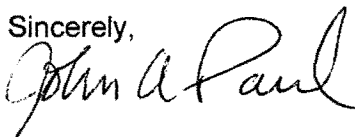
While RAPCA appreciates Ohio EPA's efforts to address these emissions by discouraging OWB owners from burning inappropriate fuels, Ohio EPA's proposed approach will not address the overall problems that OWBs present.

RAPCA recommends that Ohio EPA limit new OWB sales to only those meeting U.S. EPA's Phase I and II voluntary standards for OWBs. To date, there are about 15 models that have qualified for Phase I standards and six of these already meet the Phase II standard, which are 90 percent cleaner than unqualified units.

Furthermore, RAPCA recommends that Ohio EPA develop operational standards to minimize emissions from existing OWBs and limit the impact on neighbors living in close proximity of existing OWBs. RAPCA recognizes the challenges in enforcing such operational standards, however, we feel it is important that an enforcement tool be available to the District offices and local air agencies to address complaints from OWBs in the event the owner fails to be responsive to complaints from neighbors and/or operate the unit in a manner that will reduce emissions.

Thank you for this opportunity to offer comment. Please address any questions to either this writer or Andy Roth.

Sincerely,

A handwritten signature in black ink that reads "John A. Paul". The signature is written in a cursive style with a large, prominent "J" and "P".

John A. Paul, Administrator  
Regional Air Pollution Control Agency