

From: Gene & Martha Carpenter [gene_martha@yahoo.com]
Sent: Tuesday, December 29, 2009 1:54 PM
To: EP, RegComments
Subject: Outdoor Wood-fired Boilers

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Environmental Quality Board,

I have chosen to heat my home with an outdoor wood furnace for a number of reasons:

- * With the ever changing price of heating oil and LPG, heating with wood is an economical option. An owner of a home, farm or small business can save several hundreds or maybe thousands of dollars in heating cost.
- * Heating with wood also reduces the need to import more oil from foreign countries.
- * Using an outdoor wood fired boiler also reduces the risk of home fires, loss of life as the result of a home fire. Every year literally thousands of homes are damaged or destroyed by fires caused by indoor heating devices.
- * Using an outdoor wood fired boiler also reduces carbon monoxide poisoning.
- * Heating with wood results in no net increase in global warming gas emissions. Heating with oil, coal or natural gas is a significant source of global warming gas emissions.
- * Burning of wood also decreases the amount of methane gas released as wood rots.

The proposed regulation for "outdoor wood-fired boilers" has the potential to impact my ability to continue utilizing my existing boiler. I am strongly opposed to:

- * Not grandfathering existing wood-fired boilers. (That was installed in good faith)
- * The proposed excessive chimney height requirements are costly (parts and height determination) , time consuming and may prevent a large number of owners from being able to comply.
- * Seasonal prohibition between May 1 and September 30. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, greenhouse operations is unreasonable.
- * The weather is way to unpredictable to impose strict usage dates. This regulation is best left up to local control due the varying terrain in Pennsylvania. What works in Philadelphia won't work in New Milford or Erie, PA.
- * Opacity requirements for residential sized appliances because opacity is a subjective visual observation.

While it is foreseeable that furnace owners creating verifiable nuisances need to increase their chimney to alleviate complaints, it is unreasonable for the PaDEP to retroactively impose restrictions (with the exception of proper fuel use) on my existing outdoor wood furnace. My wood fired outdoor boiler was purchased, installed and operated in good faith prior to the drafting of the regulation.

I am opposed to the excessive and retroactive requirements of the proposed regulation. If passed as written, I believe that the regulation will adversely impact my rights and the rights of other existing outdoor wood furnace owners that use these appliances in a responsible manner. I am supportive of a state law requiring existing furnace owners to

have to comply with proper fuel use requirements and for regulations regarding new installations that are reasonable.

Many people living in rural area do not have enough property to meet the set back requirements. This is the reason this needs to be a local issue.

As a senior citizen who installed the outdoor furnace as a way to control cost of heating my home plus the reduced risk of fire and carbon monoxide poisoning, I oppose this proposed regulation. My cost to meet this regulation would be many thousand dollars.

Sincerely,
Clarence Carpenter
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