

From: kragb@netzero.com
Sent: Wednesday, December 30, 2009 1:04 AM
To: EP, RegComments
Subject: Proposed regulations to Title 35 - outdoor wood furnaces

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INDEPENDENT REGULATORY
 REVIEW COMMISSION

Dear Environmental Quality Board,

I choose to provide heat and hot water to my home with an outdoor wood fired furnace for several reasons, and would like to share those many advantages with your board.

- with the increasing cost of burning fossil fuels that also create greenhouse gases, heating with wood is the most economical option. In my situation I am burning nearly all dead fall trees that would otherwise be decaying on the ground near my home or on a neighboring campground that for insurance and safety reasons needs to remove problem/dying trees to prevent their falling onto any campers in the summer months. I also burn much of the wood that is considered undesirable to conventional indoor wood stoves including white pine, aspen, hemlock, and other woods that can be safely utilized in an outdoor wood furnace without the worry of creosote buildup or chimney fires.
- I frequent local businesses for maintenance of my chainsaws and other equipment from the result of cutting and hauling my own fuel supply.
- heating with wood is consistent with the independent practices of Americans dating back to colonial times.
- heating with an outdoor furnace eliminates the risks of fires and carbon monoxide poisoning associated with an indoor heating system because the appliance is entirely outside my home. Every year in Schuylkill County many homes are damaged or destroyed by fires started by indoor stoves and heating devices.
- research indicates that heating with wood results in no net increases in global warming gas emissions, unlike heating with oil, coal, and natural gas which are a significant source of carbon and petroleum residual air contaminants.
- the fuel I have been burning since 2006 is a renewable resource located right here in Pennsylvania that cleans up the forests in my area preventing emissions from decaying and rotting wood being released into the air.
- the use of Pennsylvania wood fuel in heating my home has not funded overseas or domestic terrorist activities.
- the use of wood requires some hard work and time by me and family that not only allows us to work together as a family, but also provides healthy physical exercise.
- Since 2006 I have personally saved thousands of dollars in heating oil expense as I have purchased only 1 tank of fuel oil over 4 years for my back up oil system.
- I have personally destroyed numerous large wood-boring insect colonies that exist in many of the fallen trees that I use for fuel. Many of those trees fell as a result of insect infestation and would continue to house the pests and allow them to multiply to other areas if not removed and burned.

The PA Dept of Environmental Protection (DEP) has proposed a regulation for "outdoor wood-fired boilers" that has the potential to impact my ability to use and right to choose to use my heating appliance as it presently exists and I am strongly opposed to the following:

- excessive and unreasonable chimney height requirements for existing and new furnace installations that are not based upon science or specific complaints. (Excessive chimney height requirements are costly,

time consuming and may prevent many present owners from being able to comply with the strict new proposed regulations.)

- Seasonal prohibition between May 1 and September 30 are without cause for many owners, especially those of use who live in a rural area with few to no neighbors. A statewide seasonal restriction for rural owners, persons with their own large wood lots, certain farming operations, and greenhouse operations is beyond unreasonable. For example, my system only fires twice during a 24 hour period during warm weather and may often use only one firebox of wood per week in warmer months, using far less natural resources and electricity than a fossil fuel/oil fired boiler in the summer months.
- Opacity requirements for residential sized appliances because opacity is a subjective visual observation.
- the 500 foot distance requirement coupled with the chimney height regulation would be impossible for some to comply with based on the hilly terrain often found in Pennsylvania and the grade of the furnace owner's property versus the neighboring property could potentially require the furnace to have a stack that is 80 or more feet in height. A much more reasonable ground distance such as 300 feet could be chosen, or the ability to appeal and/or have a site investigation completed and approved by PA DEP.

While it is foreseeable that some furnace owners create verifiable nuisances by the improper burning of unclean fuels, or maintaining an improperly operating appliance, it is unreasonable for the PA DEP to retroactively impose harsh restrictions (with the exception of proper fuel use) on an existing outdoor wood furnace user like me without a valid complaint or appropriate investigation of the appliance. My appliance was purchased, installed, and operated in good faith prior to the drafting of the regulation.

I am fully in support of the requirements to build and use the new, more efficient, phase 2 burners that are beginning to be manufactured, and I personally plan on buying one when the time comes to replace my unit, but unreasonable restrictions on existing owners may force us to purchase a new burner much sooner than we need to, or in my case, can afford to. I would also support tax incentives or a trade-in incentive program for an existing furnace owner to replace an old burner with a more efficient phase 2 model.

I am opposed to the excessive and retroactive requirements of the proposed regulation. If passed as currently written, I believe that the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that responsibly use these appliances. I am supportive of a state law requiring existing furnace owners to have to comply with proper fuel use requirements and for regulations regarding installations to be reasonable for the relatively few persons in Pennsylvania that presently use this type of appliance for heating and hot water production.

I thank you for your time and attention to this important matter.

Sincerely,

Craig B. Stine
Schuylkill Haven, PA