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Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

INDEPENDENT REGULATORY
REVIEW COMMISSION

ENVIRONMENTAL QUALITY BOARD

Dear Environmental Quality Board:

December 21, 2009

I live in a rural part of Greene County and I heat my home with an outdoor wood furnace. I selected this option for heating in 2004 due to the rising price of natural gas and the cost reduction wood heat offered, the fact that wood is readily available to me from my woodlot, the fact that wood heat does not increase global warming gas emissions as do the burning of oil, coal and natural gas, and the reduced risk of house fire with an outside furnace as opposed to indoor wood burner.

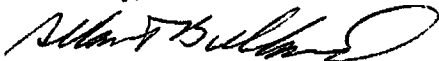
The proposed regulation for "outdoor wood-fired boilers" has the potential to impact my ability to continue using my existing furnace. I am very strongly opposed to:

- Excessive chimney height requirements on both new and existing furnaces where the height requirements are not based on science
- Having to try to meet the cost of retrofitting my furnace and the fact that I and other current owners faced with retrofitting might not be able to comply with this costly requirement
- Unreasonable statewide seasonal use prohibitions (no use between May 1 and September 30) when there are obvious exceptions that are both needed and prudent
- Opacity requirements for residential sized furnaces that are totally subjective rather than objective

While it has been shown that some wood burning furnaces in urban situations have created emission nuisances, those situations have been addressed at the local level and on an as-needed basis, usually requiring the erection of a taller chimney on newly installed furnaces. This solution is reasonable. It is unreasonable however for the PA DEP to retroactively impose restrictions (with the exception of proper fuel use) on all existing outdoor wood-burning furnaces statewide. My furnace was purchased, installed, and has been operated responsibly and in good faith for over five years prior to the drafting of the new regulation.

I am vehemently opposed to the excessive and retroactive requirements in this proposed regulation. If passed as currently written, I believe the regulation will adversely impact my rights and the rights of other outdoor wood furnace owners who use their furnaces responsibly. I would support a state law requiring existing furnace owners to have to comply with proper fuel use requirements and for regulations regarding new installations to be reasonable.

Sincerely,



Allan T. Bullard
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