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J. Dennis and Kathy S. Grube
7506 Mason Dixon Highway
Meyersdale, PA 15552
814-634-5118
December 12, 2009
Re: Proposed OWB regulations

INDEPENDENT REGULATORY
REVIEW COMMISSION ENVIRONMENTAL QUALITY BOARD

Environmental Quality Board
P. O. Box 8477,
Harrisburg, PA 17105-8477

Dear Environmental Quality Board,

Please allow us the opportunity to abbreviate the accompanying three page letter of experience and findings with respect to our outdoor multifuel boiler. Our boiler was manufactured in Pennsylvania with grates to burn wood and coal. We have heated our house for over 25 years with these two products, some acquired from downed trees in our 10 acre woodlot and some purchased from hardworking miners and loggers in PA. To declare this outside boiler illegal (it doesn't fit proposed setback and stack height limits) will result in our having to move our solid fuel heat back indoors, resulting in more dirt in the house, more emissions closer to our one neighbor, and less safety for our family. Blanket rulemaking, as proposed, cannot work in our widely diverse countryside. Let us make the following brief points, expanded upon in our enclosed letter.

- 1) PA residents are still at work to manufacture and provide fuel for our boiler; no overseas oil heat needed.
- 2) No matter what approval, UL or other, outdoor heaters are SAFER than any indoor wood and coal fired appliances. Our insurance agent and local fire departments concur.
- 3) Setbacks and chimney heights are exorbitant and discriminatory. Many folks burn wood and coal from inside their homes with no setback limits and chimney height restrictions. Our house chimney is only 20' from our neighbor's house...our outdoor boiler is over 90' away and downwind. Another upwind neighbor is 400' away, upwind, and uphill...We would need in excess of a 50' chimney to comply, while moving the heat back indoors would use the existing 18' tall chimney.
- 4) Smoke is more of a function of wind direction, barometric pressure, and thermal inversions. During colder months all of the above minimize smoking; we only ever had one complaint from our nearest neighbor when the boiler was used during the summer for domestic hot water. We quit using it from May through September and have had no complaints.
- 5) Energy use and efficiency is never forgotten when WE are responsible to supply our own heat. A twelve month gas budget does not call energy savings to mind more than putting wood or coal on our fire everyday. Self sufficiency is to be commended in this age of entitlements; we would challenge the EQB to find anyone using an outdoor boiler who accepts any taxpayer funded energy assistance. Please be thankful for saved energy dollars which can be spent on other PA. products in these dire economic times.
- 6) Our current outdoor boiler provides heat for a small machine shop in addition to our home; we provide the winter heat included in the monthly rental. If this small business owner is forced to install his own oil heat, he has said he will close up shop; He won't be able to afford the heat. Job loss will include one fulltime and one part-time worker. We are always searching for more efficiency; when new more efficient solid fuel boilers become available, we will update as we have with vehicles that have aged.

Thank you for your consideration. Please read the full details of our view and experience thoroughly. We believe that requiring a new efficiency standard moving forward is appropriate. We also believe that any property setbacks and chimney restrictions should be handled on a local permitting basis. Winter in our hills cannot be imagined from either end of this wildly varied state. Please reconsider this proposal, so harmful to many PA residents.

Sincerely,



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Dear Environmental Quality Board,

It has come to our attention that the Environmental Quality Board is considering sweeping proposals regulating the use of outdoor wood-fired boilers (OWB) in Pennsylvania. We would like to offer some insight and suggestions as users of an outdoor boiler for the past six heating seasons (we burn PA coal and PA clean wood in our multifuel outdoor boiler and will refer to it as an outdoor boiler or heater in this letter). We have enjoyed comparatively low-cost heat for our home and an on-property rental building, housing a small machine shop and machining business. The use of this method of heating allows this small business to remain viable in this tough economy...without this economical heat, which is included in the monthly rental, this business will succumb to the tough times and two jobs would be lost. We currently have two daughters in college and every penny that we save on heat allows us to help our children to complete their education, keeping our household finances viable also. Please allow us to explain, from experience, what we have found over these past heating seasons.

- 1) We use downed wood from our own small woodlot, purchase some slab wood from a neighboring sawmill and logger, and purchase bituminous coal from neighboring coal mines to fire our boiler. All of the money that we spend to heat stays in PA. Without this source of heat, we may be forced to use oil, sending hard-earned PA dollars out-of-state, and possibly even to countries hell-bent on the demise of the USA.
- 2) We had heated with a woodstove for years, and then purchased an indoor coal boiler. My wife was very happy when we moved the coal and wood dirt outside of the house; my insurance agent (also a local volunteer fireman) was the second most pleased. Although wood fired stoves, heaters, and other boiler units used indoors may be very safe and even UL listed, they cannot be as safe as a free-standing outside heater. If our outdoor boiler is outlawed, we will be forced to move all of this back indoors, not be able to heat the rental building at that time and be forced to worry more about flue fires and overheating issues that had become past history in our home.
- 3) We are blessed to now own 21 contiguous acres, more than enough land to comply with the setback limits proposed. However, our current heater location was picked for the most efficient operation and midpoint (70' from each side of our original deeded 140' by 600', 2 acre property on which our house sits); the manufacturer's recommendation was to minimize underground pipes to within 100' of the heated building. With the proposed setback limits, it would be impossible to comply with this regulation, in fact with a perfectly shaped square property one would need a minimum property size of 310' by 310' (10 extra feet for boiler footprint plus 150' each side) or 2.2 acres AND the ability to center the OWB on the property. Very few properties in PA are a perfect square, and this will be a burdensome requirement; it will also increase

heating costs and inefficiencies due to longer underground runs. We could move our boiler that far from our property lines, but that would locate our boiler about 260' from the house. This is all happening with only ONE occupied dwelling within a quarter mile, downwind. These setback limits should be accomplished through Local Township and Municipality permitting, with issued guidelines, but also an eye to prevailing winds, months of operation and variance authority.

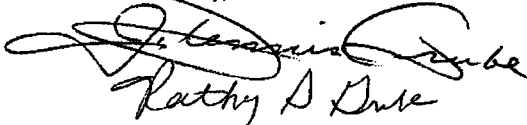
- 4) We have one elderly neighbor within 100', upwind of us and we did have a complaint from her while heating our domestic hot water through the summer. There does tend to be a more smoldering-type fire at that time of year resulting in a lot of creosote buildup and little actual firing of the boiler. We did discontinue the use of our boiler over that time of year, now only firing between late September and Memorial Day (Somerset County has a recorded frost in every month of the year, except July). We would agree that a winter heating season for outdoor boiler use makes sense, particularly in more heavily populated areas. It is also known as neighborly out here...when common sense is used, there are few complaints to be heard. However, when someone has an axe to grind with a neighbor, no amount of legislation and rulemaking will solve that problem.
- 5) Chimney height regulations appear to be a rather foolish attempt to provide a "fits all" solution to a complex smoke issue. What smoke our boiler emits is virtually all within a half hour period, twice a day after new fuel has been loaded. Any smoke leaving our narrow property is more a function of wind direction, barometric pressure and any thermal inversions on our hillside acreage. We have a neighbor whose house is about 400' from us, it is upwind (northwest), he heats with coal inside, (although he has talked of moving his heat outside for safety and cleanliness) and his house elevation is some 30'+ above ours. We would have to install a 50'+ chimney on our boiler by this regulation. That is astronomically above the manufacturer's recommendation and the 12' chimney that we currently have installed. Our house is downwind, and 70' away from our boiler, another downwind neighbor is 175' away; we have no staining, no smoke inside and no problem with complaints (other than previously mentioned). We actually have LESS smoke than when we fired our inside coal boiler; it was smaller in capacity resulting in more loadings per day, hence more smoke. Additionally, this height requirement could actually be construed as discriminatory, since no one with an indoor wood and/or coal fired heater is required to have these exorbitantly tall chimneys.
- 6) There are some miscellaneous advantages in using an outdoor boiler that may not be readily apparent. Living in coal country, we chose our MULTIFUEL outdoor boiler to take full advantage of our local economy and keep our friends and neighbors employed. We believe in leaving a small footprint in our favorite corner of PA; we choose low-input farming methods, we recycle, and we conserve energy where possible. Our outdoor boiler allows us to be good stewards of the downed wood in our woodlot, to heat two buildings for less than the cost to heat either building alone with oil, and to be as self sufficient as possible. We believe that we are much more conscious of our energy use when we are responsible for maintaining the very fire that warms our home and heats our water than someone who pays their monthly natural gas bill on a twelve payment-a-year budget. We would challenge this board to find a family using an outdoor boiler who has accepted heating assistance; I know a number of folks who are now

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forced to live on unemployment compensation because their job was either seasonal or has been lost due to the slow economy, but they can continue to keep their family warm without an increased burden on the public assistance system in PA by using "home-made" heat. Although we are thankful to be working, these are some more of the people that could be harmed in the "fits all" sort of proposal which is before you. There really needs to be more of a local flavor to this entire proposal that is missing, these regulations may well be needed for a subdivision, or a suburban environment, but the challenges of living, working, and providing for our families in rural PA deserve more consideration. We are not against new, more efficient, clean-burning standards; when we need to replace our current boiler, we hope that there is a more efficient model available, just as we search for more efficient automobiles to replace older ones. We count ourselves fortunate, but we also strive hard daily to not buy into the entitlement mindset, instead, preferring to provide for our family in the most frugal, cost-effective manner possible.

We have spelled out many of the advantages that we have found in providing for our family's heating needs with an outdoor boiler in one of the coldest counties in PA. We have used some source of alternative heat, whether woodstove, coal boiler, or our current outdoor boiler since we purchased our home 25 years ago; hopefully, we will continue to be allowed to do so. It is easy to make decisions from afar, not taking into account local jobs, local products and the self sufficiency of your rural neighbors. We bought into the great idea of wind power, but watched wind towers 800' from our house sit becalmed hundreds of hours every year. From afar, wind energy is great and solves energy needs; however, when you live in the shadow of these wind towers and see all of the days that they sit idle, it certainly causes us to question if they will ever provide any meaningful, reliable power and why some tout them as so vitally important. It appears that some of those very same people would like to make rules from afar, not fully understanding the far-reaching ramifications to the rural economy of PA in their decision-making. We believe that the Environmental Control Board would do well to recommend that all future outdoor wood boilers sold in PA adopt the new standards proposed, the Board may well recommend a reduced operating period restricted to the colder months of the year depending on local conditions, and finally recommend some setback and chimney requirements while allowing local variances to be granted depending on the differing and widely divergent conditions found throughout this great Commonwealth. Thank you for allowing us the chance to register our view, we are always available for questions and further explanations of any points contained herein which may not be clear or may be misunderstood. We live here because we chose to, we raised our family here because we chose to, and we plan to continue to make PA a better place to live in the years to come. Help us accomplish that with common sense solutions.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dennis and Kathy S. Grube". The signature is written in a cursive style and is positioned above the typed names.

J. Dennis and Kathy S. Grube