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Environmental Quality Board

INDEPENDENT REGULATORY
REVIEW COMMISSION

ENVIRONMENTAL QUALITY BOARD

Ladies and Gentlemen of the Environmental Quality Board:

In response to the regulations being proposed by the Pennsylvania Department of Environmental Protection regarding the Outdoor Wood-Fired Boilers, I would like to express my concerns on how this proposed regulation will affect many Pennsylvania home and business owners, like myself, by presenting bulleted items listed within that point out the benefits of owning and operating an Outdoor Wood-Fired Boiler.

- ✓ Safety first! Operating an Outdoor-Fired Boiler is undeniably safer than using an Indoor Wood Stove when young children are involved. Families do not have to worry about constructing a safety guard for the young children to assure they do not touch the sometimes 400+ degree wood stove and stove pipes.
- ✓ Outdoor Wood-Fired Boilers eliminates the threat of an indoor fire by being self-contained and separated from the elements. This reduces insurance costs as well as risk for loss of life caused by a malfunctioning or improperly cared for Indoor Wood Stove.
- ✓ Using Indoor Wood Stoves contributes to unhealthy amounts of indoor air pollution which can affect ones breathing and cause asthma related to the indoor wood stoves emissions that can be corrected by changing to an Outdoor Wood-Fired Boiler. Ultimately reducing the affect on ones health as well as the unnecessary load placed on the healthcare system as a whole.
- ✓ Wood has been safely used as a fuel since the beginning of recorded history -- longer than any other fuel.
- ✓ Wood will still be available as a heating source when the world runs out of oil which is expected to happen within 50 years according to some studies. To place restrictions on the use of Outdoor Wood-Fired Boilers now would cause an unnecessary strain on the economy later as the demand outweighs the supply for wood stoves when wood stoves are some consumers' only realistic, economical option to provide heat for their homes.
- ✓ Wood is a renewable resource, burns cleaner and is less expensive than other fuels.
- ✓ Wood eliminates the consumption of dwindling fuels in the environment.
- ✓ Burning wood benefits the environment by reducing the wood waste that would otherwise take place in landfills.
- ✓ Burning wood produces the same amount of carbon dioxide that would otherwise be released if the tree died and were left to rot on the forest floor.
- ✓ Burning wood helps forests and serves as a pruning effect on overgrowths so that trees can expand and grow to their full size. Ultimately allowing for the natural process to reduce carbon dioxide.
- ✓ People who live in rural areas can find and chop their own wood, meaning they never have to pay for heating fuel.
- ✓ Outdoor Wood-Fired Boilers are generally less expensive than many other heating systems.

- ✓ Per BTU, Wood is much less expensive than fossil fuels.
- ✓ Government agencies, government employees, foreign fossil fuel suppliers and those holding shares in their companies are not getting rich from those who burn wood. There is no billion-dollar wood fuel utility that profits from the wood heat business. Most businesses that supply furnaces are small manufacturers and retailers. Local workers who chop firewood and provide maintenance services to the wood heating systems get the benefits of the local dollar.

The proposed regulations do not directly impact those who live within an urban environment and burn fossil fuels to heat their home so why should those individuals be proposing these regulations? Many local municipalities have been regulating the use and installation of Outdoor Wood-Fired Boilers since their origination which allows for a more customizable set of regulations instead of blanketing all of Pennsylvania under one set of regulations that best suite the urban lifestyle.

The only thing that these proposed regulations would do is add to the hardships many families are facing due to today's economy. Denying Pennsylvania residents the ability to have an economic advantage offered by an Outdoor Wood-Fired Boiler by not allowing some rural residents who own less than two acres of perfectly proportionate lots (to meet the 150' from each property line install guidelines) to install and utilize an Outdoor Wood-Fired Boiler, setting height requirements on stacks (which would add more economical strains on the residents) as well as Seasonal use restrictions between May 1 and September 30 would add to the economic strain these residents may have on Federal and state budgets. Many residents may be forced to use state-aided heating programs when they could be utilizing an Outdoor Wood-Fired Boiler and a renewable energy source as their main heat source which would be free of charge in most cases. Many residents would also be forced to add money into foreign and government pockets instead of investing in their local economy by being forced to utilize a different heat source and purchase fossil fuels such as oil.

Placing such blanket regulations on Pennsylvania residents is going to do nothing to help the state of Pennsylvania. With the proposed regulation we are being told how we can provide heat for our homes and families, what regulations will be placed upon us next? Regulations on where we can shop to provide food for our family or how much electricity we can utilize in our home even if we are the tax payers paying for it with our hard-earned dollars?

And relating to dollars, if an Outdoor Wood-Fired Boiler is such a hazard to the environment and regulations are trying to be forced upon us that do not reflect the realistic rural circumstances then why does the government allow for the tax-rebate on such units? A federal tax credit by the name of Residential Energy Efficiency Tax Credit allows for a 30% tax credit of the system cost as well as the labor up to \$1500.00. There is also a Pennsylvania state loan and grant program by the name of Alternative and Clean Energy Program offered by the Department of Community and Economic Development (DCED) and the Department of Environmental Protection (DEP). Why are such programs available to promote the purchase and use of Outdoor Wood-Fired Boilers which qualify under each of the above programs for a tax credit if the risks outweighed the benefits for the environment, economy and ones' health?

Stop wasting the tax-payers dollars discussing unrealistic regulations and start putting our tax dollars to work to pump more money into the Pennsylvania local economies.

Respectfully,



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