

**From:** John Lichak [bjlich@live.com]  
**Sent:** Monday, January 04, 2010 7:26 AM  
**To:** EP, RegComments  
**Subject:** 25 PA.Code Chs.121 & 123

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INDEPENDENT REGULATORY  
COMMISSION

Dear Environmental Quality Board Members:

Although we are not PA residents we often visit our relatives in Glendale and vacation in PA and therefore feel compelled to comment on your proposed regulations regarding Outdoor Wood Boilers. Per your notice Glendale (Cambria County) is a non-attainment area for the 2006 EPA 24 hour fine particulate NAAQS and this regulation would therefore seem especially important to the health of our relatives (the Wasmuckys) and to us when we visit.

The Regulation as proposed will not be health protective. PA should not be following the lead of the EPA which established voluntary standards for OWBs but rather setting strict air standards as are used in the State of Washington where no OWBs can currently meet that standard.

Although the EPA updated its air standards in 2006 the health community does not agree that they have gone far enough for PM 2.5 -10. On 12/5/05 a letter was sent to the EPA by Joel Schwartz, Professor of Environmental Health and Epidemiology at Harvard School of Public Health (this letter was found on line). This letter was co-signed by over 100 prominent environmental health researchers and physicians. This letter urged the EPA to set the new PM 2.5 standards at 12ug/m<sup>3</sup> for the annual standard and 25 ug/m<sup>3</sup> for the 24 hour standard. Clearly the EPA did not adopt the health protective standard. PA should use the health community recommended standard for its air rather than following the equally dismal leadership of the EPA concerning OWBs.

The EPA's voluntary standard is not health protective. The "cleaner" white and orange tag stoves are a misnomer to say the very least. Per the Northeast States Co-ordinated Air Management (NESCAUM) a stove could meet the EPA standard and still emit 95 g/hr. ([www.nescaum.org](http://www.nescaum.org)). In fact if you look at the EPA website they very clearly state OWBs are NOT being held even to the same standard as indoor wood stoves. The Method 28 OWHH test used to "certify" stoves is not real life burning. You can NOT legislate what people will burn. The Method 28 OWHH test used KILN DRIED red oak. The list of "cleaner" hydronic heaters for phase 2 using this ridiculous source of wood still resulted in stoves w/18 grams per hour vs. a gas furnace of .04 grams per hour.

I urge you to revisit your course of action and to read the 9/9/08 latest report from the Northeast States Co-ordinated Air Use Management:

<http://www.nescaum.org/documents/source-characterization-of-outdoor-wood-furnaces/>

These stoves are designed to automatically cut the oxygen supply which causes them to smoulder. The smoke that is emitted can continue for hours when the damper is in the open position. Because of the incomplete combustion this smoke is filled w/dangerous PM 2.5. PM 2.5 gets past your nose filters and the particles imbed in your lungs causing serious debilities -- pneumonia, bronchitis, emphysema, cataracts, cancers, heart disease, high blood pressure. PA residents will pay dearly w/their health care costs and lives if you do not legislate a better standard.

Incomplete combustion includes a caustic swirl of chemical agents, including benzene, butadiene, styrene, formaldehyde, dioxin and methylene chloride. We believe that our relatives and we too when we visit should not have to breath such a toxic mix of chemicals.

We look forward to a much revised air standard in PA and hope that the States will all petition the EPA to adopt more stringent air standards for the nation for the sake of all of us but especially for our children and future generations.

Thank you,  
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