

From: Joel Myers [joelmyers@myersfarm.com]
Sent: Monday, January 04, 2010 10:54 AM
To: EP, RegComments; joelmyers@myersfarm.com
Subject: Proposed Regulation on Outdoor Wood burners(OWB)
Attachments: joelmyers.vcf

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INDEPENDENT REGULATORY
COMMISSION

Importance: High

January 3, 2010

TO: Environmental Quality Board

SUBJECT: Proposed rulemaking [25.PA,CIDE CGS, 121 and 123] Outdoor Wood-Fired Boilers [39 Pa.B.6068]

I recently learned of your proposal on OWBs and would like to comment on this document. I am aware that in certain situations OWBs can cause environmental issues. I do know that currently these issues are being handled thru local municipalities and are also investigated on a complaint basis in our rural community. I have traveled a lot thru most of Pa and am aware that there is a wide range of situations where OWBs are used. I have seen many used in Agricultural Settings. Some of the benefits of these units which i am sure you are aware of are listed below:

They enable users to utilize waste wood products frequently trees that die and may never be used if not in OWBs. Also following logging operations there are many trees that partially or completely are not of adequate quality for lumber along with larger branches from tree tops. These also provide much fuel for OWBs. I have used an OWB for about 12 years. It has enabled me to use dead trees and trees cut in managing my woodlands that are not of lumber value for fuel. It has enabled me to move away from oil and become more green, which is the current trend promoted by government at many levels today.

I have located my OWB about 20 feet south of my house due to prevailing winds from the north west. i have experimented with the height of my pipe. i have been as high as 12 feet above the stove to as low as 6 feet above the stove. Also since my house is two stories high, even with 12 feet of pipe i am about 10 feet below my roof line. My observations have resulted in me not worrying about keeping the pipe very high. Irregardless of the pipe height, when there are down drafts, swirling wind or periods of low pressure, the smoke will at times go down to near ground level and when the opposite weather prevails, the smoke will be rising quite rapidly and does not cause a problem at all. i am very much opposed to the implication that certain of these regulations would need to apply to your own home. Example would be pipe height where i would need at least 30 feet of pipe to reach my roof line and currently there is no problem with 6-10 feet of pipe, due to the use of common sense items described in the following paragraph.

From my observations, good common sense relevant to siting the OWB, the type and condition of the wood burned, and the seasons of the year when the wood stove is fired will go a long way to avoiding complaints and issues from neighbors and others near a home using a OWB.

These regulations would have a very adverse and negative impact on agricultural operations that use them to heat buildings that require heat in farm operations. These could include farm shops and equipment areas and areas where heat is required in a livestock operation, not to mention actually heating living quarters in a cost effective and green way. These farm operations, such as at my property usually have woodland or wood lots where dead trees and other trees not suitable for commercial use can be utilized to produce heat and reduce the need for oil and electric heat.

We are reaching a period in our country where some want to take away the freedoms that our country was founded upon. It is my personal opinion that this is another example of this issue of freedom. As previously stated local government can handle problems or issues on a complaint basis. Being a good neighbor and using good judgement can go a long way to dealing with most of the bad situations, and i do know there are a few of those out there in the world, but not enough to regulate all for those few.. i am very much opposed to any type of government registration of OWBs and any ban which would not allow one to sell their OWB for what ever reason they needed to do that.

Thank you for the opportunity to voice my opinion on this draft regulation, i hope you will consider the primary points that i have discussed and hopefully leave these issues to be addressed locally throughout Pennsylvania.

Sincerely,

**Joel C. Myers
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