

**From:** Rosemary Bezy [rosemarybezy@yahoo.com]  
**Sent:** Monday, January 04, 2010 11:59 AM  
**To:** EP, RegComments  
**Subject:** Proposed Rulemaking 25 PA. CODE CHS> 121 AND 123 Outdoor Wood Fired Boilers

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Environmental Quality Board,

I am writing in response to the proposed rule on Outdoor Wood-Fired Boilers. Currently, I am employed in the Coke Making Industry, so the issue of Clean Air is not new to me. Too often, Companies do not keep up with technology to reduce or eliminate pollution. They consciously choose to pay the fines and penalties and write them off as the cost of doing business. This is not an option for the Homeowner.

Using wood as a fuel source is not a convenience it is a necessity that is quite laborious. Even if a person buys the wood already cut there is still the job of maintaining the fire and storing the wood. For most the decision to heat with wood was not a choice it was a necessity. If they had to use gas, oil, or electricity, they may have to go without other things such as medical care. This may sound drastic to some but it truly is reality.

I would like to address some of the proposed rule directly. The stack height on existing boilers should be grand fathered in. In some cases the furnaces were installed close to the homeowners residence to accommodate the boiler feed and return water lines. When these lines are long the efficiency can be compromised. Also some of the people who use these furnaces are elderly people who need them to be close. These same people are on fixed income and the cost of retrofitting will be a hardship. Also, it may be hard to install the pipe above the roof line without extensive erection of a support pole and guy wires. So you can see this is not a cost effective option for the homeowner, and in some cases may not be possible due to the location of other residences.

The issue of what type of fuel can be burned is something that should be looked at. It should be noted that there are current boilers that burn waste oil. There should be some investigation into building boilers that can burn waste products environmentally. It may be in the form of incentives for the manufacturers to design such units and tax credits and purchase incentives for homeowners to buy such units. The issue of waste disposal is not new. I live near a municipal garbage dump that is getting higher by the day. When the wind kicks up the plastic bags and other lighter debris float and litter the surrounding neighborhoods and highways. Using tax dollars to find ways to permanently dispose (incinerate) waste environmentally would keep it out of the air, ground, and water where it ends up now.

The seasonal question is a good one. Many of these units are designed to heat domestic hot water as well as heat boiler water. As mentioned the decision to use wood as a fuel source is sometimes an economic one. To keep the gas turned on during the winter months solely for the purpose of using it in the summer months would mean the homeowner would have to pay the monthly fees just to have the service available. I have an Aunt that is 92 years old. She uses Natural Gas to heat her home. Her budget is in excess of \$200.00/month. She has her heat on in May and sometime June, and again in September. If there is a cold snap in the summer months it is not unusual for her to turn the heat on. She does not use a wood fired boiler because she cannot load it with wood, but for some elderly people cold is relative to their individual preferences. Some of these wood boiler owners may want to heat during the seasonally restricted period.

As I said earlier, I am familiar with the Air Quality issue. My husband and I also believe in taking care of the environment. We currently use organic methods to grow food. We use solar powered equipment when we can. Our financial status at this time allows us to do this. When we both retire our options may become more limited.

The options available to industry are greater. They have the resources to control pollution on a grander scale. They also create pollution on a grander scale.

Summing up, I believe the older units already sold and in place should be grand fathered in and the newer units can be made to comply with a stricter level of compliance. The manufacturers should be made to construct units that meet the newer requirements. This design phase may need to be adjusted and the date the new rules become effective may need to be delayed to allow manufacturers time to design these units properly so we don't experience a flood of units that will not operate efficiently and within compliance for a long period of time. Also the regulations themselves (stack height, fuel sources etc...) may be able to be adjusted to align with the new technologies.

Thank you for the opportunity to address the proposed rules for outdoor wood fired boilers.

Rosemary Bezy