

From: Lori Robinson [LRobinson@spheris.com]
Sent: Sunday, January 03, 2010 10:22 PM
To: EP, RegComments
Cc: 'scott.l.robinson@lmco.com'
Subject: Proposed Outdoor Wood Boiler Regulations for Pa.

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2010 JAN -03 PM 4:37

INDEPENDENT REGULATORY
TECH COMMISSION

Dear Members of the Environmental Quality Board,

I am a resident of the 110th district in northeastern Pennsylvania. I am writing to express my concerns and disapproval of the proposed regulations for outdoor wood boilers.

I have chosen to heat my home with an outdoor wood furnace for a number of good reasons:

- o With the ever changing price of home heating oil, natural gas, and LPG, heating with wood is an economical option - a furnace owner that heats with wood in an outdoor furnace can save thousands of dollars a year on home, farm, and small business heating costs.
- o Heating with wood is consistent with the independent practices of Americans from as far back as colonial times.
- o Heating with an outdoor wood furnace eliminates the risks of fires and carbon monoxide poisoning associated with an indoor heating systems because the appliance is located outside. Every year literally thousands of homes are damaged or destroyed by fires caused by indoor heating devices. This factor of safety is very important to me for the well being of my three children.
- o Heating with wood results in no net increase in global warming gas emissions. Heating with oil, coal, and natural gas is a significant source of global warming gas emissions. The proposed regulations would force me to abandon my outdoor boiler that I paid \$13k for and resort back to heating with coal - a far worse contributor to pollution than wood.

The Pennsylvania Department of Environmental Protection (DEP) has proposed a regulation for "outdoor wood-fire boilers" that has the potential to impact my ability to continue utilizing my existing appliance. I am strongly opposed to:

- o Excessive chimney height requirements for existing and new furnace installations that are not based upon science.
 - Excessive chimney height requirements are costly (parts and height determinations), time consuming and may prevent a large number of owners from being able to comply.
 - Such chimney height requirements do not exist for indoor wood, oil, or coal burners. I would like to know what the difference is!
 - I would also like to know what is driving this requirement! Anyone knowledgeable of chimneys, air density, and have witnessed actual chimneys in use will know that smoke/emissions do not always rise straight up. Chimneys 20 ft higher than the peak of my house and greater than 500 ft away still produce smoke that travels through my yard!
 - This requirement does nothing to control emissions!!
- o Seasonal prohibition between May 1, and September 30. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, greenhouse operations is unreasonable.
- o The minimum distance of 150 ft from the nearest property line. Again, this is unreasonable for all applications/locations.
- o Opacity requirements for residential sized appliances because opacity is a subjective visual observation.

Regulations of this type need to be left to the local governments to determine. The population density and landscape/environment across the state varies to greatly to allow any one authority to make one set of rules that will work for all. Regulations need to be tailored preferably for each wood boiler installation. Knowing this is not feasible, the local

governments should be the ones to set the regulations based on zoning. It is unreasonable for the Pa DEP to impose such regulations, with the exception of proper fuel use, on outdoor furnaces (new or existing) especially ones that are retroactive. My appliance was purchased, installed, and operated in good faith prior to the drafting of the regulation.

I am opposed to the excessive and retroactive requirements of the proposed regulation. Wood burning is a green alternative for heat and yet organizations such as you are proposing legislation that will push people such as myself back to non-green alternatives!! If passed as currently written, I believe that the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that use these appliances in a responsible manner. I am supportive of a state law requiring furnace owners to have to comply with the proper fuel use requirements to be reasonable. You need to leave the rest to the local governments!!

Thank you for your time and support on this matter!

Scott and Lori Robinson

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