

From: Charette Steve [justplainolsteve@yahoo.com]
Sent: Friday, January 01, 2010 11:25 PM
To: EP, RegComments
Subject: PROPOSED RULEMAKING [?25 PA.?CODE CHS. 121 AND 123?] Outdoor Wood-Fired Boilers

My name is Steve Charette, I support regulation of Outdoor Hydronic Heaters (OHH) in PA., in hopes that my child that lives in PA. will not get poisoned like his 2 younger brothers here in Rhode Island who were poisoned by a neighbors OHH. I also frequent PA. and hope what I have to offer below helps you make effective regs.

The biggest issue in dealing with any regulation is the misunderstanding of the EPA voluntary program and the EPAs recommendations to the States and municipalities. The lobbyist's for the Boiler manufactures play the shell game with everyone and have them looking at the EPA's voluntary program instead of the Model Rule. If one is uniformed they might assume that the EPA supports and advocates these supposed cleaner models. The voluntary program was put in place to encourage manufactures to design cleaner units nothing else. It is also there in case states did nothing. **The EPA's position** on OWB's is for the states to follow the most stringent recommendations of the Nescaum Model Rule.

The best way to achieve this, protect the general public and still allow OWB's is to allow only a maximum amount of Particulate Matter measured in **Grams per hr** to be emitted. Thus would compel the operators to use only the newest technology. The units would burn cleaner due to their fuel (pellets). It would eliminate anyone burning trash, tires or railroad ties as the OWB would be fed pellets through a hopper. Most importantly it would eliminate the toxins that were being emitted as these devices do not smolder their fuel. The Nescaum model rule uses .32lbs / MMBTU's of PM2.5 with a maximum 15 grams per hr during any test run; however since the model rule was written there are even cleaner models out there with less than 10 grams per hr.

Any existing unit that is not a phase 2 that emits .32lbs / MMBTU's of PM with a maximum 15 grams per hr should be moved so as at least 500 feet from any residence it does not serve. The alternative would be to upgrade. Most manufactures will accommodate an upgrade and meet them half way on the cost.

The rest is down hill if the existing units are upgraded. To add assurance a site plan should be required when a permit is pulled so as to avoid any future problems if something is directly down wind. Below is an example (taken from a bill in RI)

A written application shall be submitted to the municipal building official before a building permit is issued. The application must show compliance with all applicable state and local building codes and local zoning ordinances, and must include a site plan prepared by a licensed land surveyor or professional engineer showing both the vertical and horizontal control measurements required by this chapter, indicating proposed boiler location in relation to all buildings on site and all neighboring residences on all abutting properties showing their structures and swimming pools together with distances to all roads adjacent to the proposed site, and distances from the boiler to woods, brush, and flammable structures. The plan must include the prevailing wind direction.

Thank you.

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