

RECEIVED

December 31, 2009

To: Environmental Quality Board

RECEIVED

JAN - 4 2010

Subject: Proposed Rulemaking 25 PA.COCE CHS. 121 And 123 Outdoor Wood-Fired Boilers 39 PA B.6068

ENVIRONMENTAL QUALITY BOARD

Gentleman,

Here in Centre County, there are already rules and regulations set forth by the townships and boroughs regulating out door wood burners. Is it really necessary for the EQB to get involved with this issue? I am sure the proposed rules are mainly a result of those operators who would be considered nuisance operators. Those of us who don't fall into that category will be required to abide by a new set of rules and regulations that has the potential to make my investment in my out door stove very costly and potentially worthless.

In 2004, I purchased and OWB as a supplemental heating unit for our farm. The price including installation was over 14,000.00. It was made in Pennsylvania, (jobs) manufactured to burn wood or coal, more logging and local Pennsylvania jobs. The woodstove has reduced our dependence on propane over 80% saving us nearly 8000.00 dollars per year. The OWB was installed by a licensed heating contractor and installed with the correct stack height according to the manufacturer. We burn "clean wood" and Pennsylvania anthracite coal and nothing more. We compared the heating cost of wood, coal, propane, fuel oil and electricity prior to making our investment. Under some of the proposed rules our investment would be reduced to zero and be very costly to make improvements to our heating system should the proposed rules become laws.

In particular, the proposed stack height requirements void our warranty with the manufacture. We would have to raise our stack over 34 feet using a crane, costing 2600.00 to become compliant. We purchased our wood burner prior these proposed rules; therefore we should be grandfather in before the rules are placed in effect. We are located on land that is zoned agricultural and the proposed rules are unfair. Perhaps only nuisance wood burners should be required to have their stack height increased.

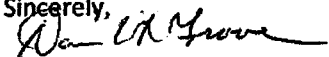
Next, the proposal to restrict the resale of OWB inside the Commonwealth of Pennsylvania should be deleted. No State or Federal agency has any business telling us what I can do with my used wood burner. We have in place what is called the free market and capitalism to take care of that issue. I don't recall the "cash for clunkers" program giving all the gas guzzlers nothing for their used automobiles. My used wood burner would be worth nothing if these proposed rules went into effect. Again, costly and unfair to us.

Also, the proposed setback requirements could be reduced from 150 feet to 75 feet. The phase 1 wood burners put out very little smoke and since predominant wind direction and local zoning play a function in the equation, a 75 foot setback seems more reasonable. Also, I prefer to run my out door stove when heat is required and no more. Due to seasonal variations in climate and temperature, a farm or business has different needs. Restrictions as to the operation of any wood stove should be left up to the individual and their specific needs.

Next, requiring my dealer and my self to register and store documents similar to guns laws is unnecessary, costly and red tape.

Finally, I am all for cleaner air and less pollutants. However, to enact rules and regulations and not give consideration to those of us who have invested in an OWB several years ago would be unfair and costly.

Sincerely,



Dave Grove Pres. Nittany Valley Farms, Inc, P.O. Box 5206, Pleasant Gap, PA 16823