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Environmental Quality Board
PO Box 8477
Harrisburg, PA 17105-8477

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INDEPENDENT REGULATORY
REVIEW COMMISSION

ENVIRONMENTAL QUALITY BOARD

FROM:
John A. Habarka
PO Box 641
Grove City, PA 16127

Re: Proposed Rulemaking [25 PA. Code CHS. 121 and 123] Outdoor Wood-Fired Boilers

Dear Board:

Please do NOT proceed with your proposed rulemaking regarding outdoor wood-fired boilers. I believe this would be unacceptable for our Commonwealth and I have explained my concerns and suggestions in this letter. I recently installed my unit and took steps to ensure that my furnace does not create a pollution problem for any of my neighboring properties. I feel that WHAT owners are burning in the furnaces is more of a problem than WHERE they located. I have added an eighteen foot stainless steel stack which brings the overall height of any emissions to 25 feet. This is actually higher than many chimneys that are built into houses. I only burn clean seasoned wood. These two factors alone result in no more of an emission output than most indoor wood stoves or fireplaces. Any smoke from my unit dissipates before it reaches any structure not located on my property. Additionally outdoor wood furnaces only fire periodically depending upon heat needs and outdoor air temperature...the more frequent the firing the cleaner the burn. Less frequent firing results in longer smokeless periods. Indoor units and fireplaces smoke all of the time and are inside the house resulting in poor indoor air quality, carbon monoxide poisoning and house fires. Emissions from outdoor wood furnaces are greatly dependent upon how the unit is operated by the owner. All of the smoke, carbon, dust and insects stay outside the home.

In addition the Commonwealth of Pennsylvania consists primarily of heavily wooded, rural areas. It makes no sense to burden the citizens of the entire rural commonwealth with a rule that really only needs to apply to a few densely populated areas.

It is also important to note that wood is a **RENEWABLE FUEL** that has been safely used since the beginning of recorded history and probably since man inhabited the earth. Using wood for heat does not harm the environment but using **FOSSIL FUELS** does. Any carbon put into the atmosphere by burning wood was initially absorbed by the growth cycle of the tree. It is an even exchange. This is not the cast with gas, oil or coal. The carbon was trapped inside the earth and is now released into the atmosphere. **The United States Government has clearly stated that wood burning is not harmful to the environment in terms of greenhouse gases.**

Several changes to the proposed regulations would make them significantly more compliable by those who operate an outdoor furnace or will do so in the future. This would significantly reduce or possibly eliminate all complaints concerning these units. I feel that the proposed regulation was prepared using extremely flawed data and/or manipulated for other reasons.

These are my suggestions:

Foremost, any regulation should be left to LOCAL MUNICIPALITIES. Any needed regulation can be easily and effectively managed by local government of densely populated areas. It makes no sense to apply regulations to everyone if only a small portion is affected.

Installation 150 feet from the nearest property LINE is overkill and unnecessary. I suggest that it read 100 feet from the nearest HABITABLE STRUCTURE not on the operator's property. Ten feet from the nearest property line is sufficient, the same distance required for a building permit and fire code. If either of these are impossible to comply with then the stack height must be at least two feet higher than the peak of any habitable structure within 150 feet not on the same premises.

The regulation of stack height being two feet above any structure within 500 feet: Two feet higher than any structure within 500 feet of a unit is plausible but mostly impossible in reality because of terrain, safety and cost. This regulation would result in stacks being extremely high and unsafe. The result would be extreme creosote build up, stack fires which could cause the stack to melt, collapse and cause property damage and/or endanger the health and welfare of persons resulting in lawsuits. With these stack heights the emissions would significantly increase due to the creosote buildup and burn off.

Furthermore I feel that the proposed regulations will damage the economy of and create a legal nightmare for the Commonwealth of Pennsylvania for the following reasons:

Burning wood for heat saves money for businesses and homeowners, especially if they have their own supply. This is money that can be put back into the economy by purchasing other goods and services. This would be a horrible time to enact such regulations given the state of the local and national economies given the past several years. A long economic downturn is forecast and may continue for years more.

The commonwealth should be looking for ways to provide their citizens a way to stay warm in their homes without facing financial disaster. Electric is forecast to rise 30% over the next two years. Is this type of increase necessary or just a way to increase utility company profits? There is a FINITE amount of fossil fuels available and at the ever increasing rate of human consumption those will be gone by 2050 if not sooner. This can only serve to inflate the cost of

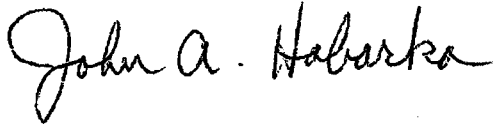
energy due to supply and demand.

Burning wood for heat decreases our dependence on foreign oil. Energy independence has been the number one priority when it comes to our nations energy needs. Since the 1970's, elected officials have made this a huge part of their campaign. The businesses that supply wood, furnaces and maintain chimneys are all local and their livelihood depends upon this business. No foreign oil company reaps any profit from wood heat.

The proposed rulemaking will force many citizens to use indoor fired heating appliances. These units are far more dangerous and will result in serious injury and even death from carbon monoxide poisoning and house fires. The result is inevitably costly litigation. If there are nuisance problems with outdoor wood furnaces, what problems will be created by forcing citizens to use inside units?

I recommend that the Board NOT adopt the proposed or any regulation of Outdoor Wood Furnaces but leave such regulations to be managed by local municipalities of densely populated areas. Doing so would be a blessing for the economy and citizens of the Commonwealth of Pennsylvania.

Sincerely,

A handwritten signature in cursive script that reads "John A. Habarka". The signature is written in dark ink and is positioned below the word "Sincerely,".

John Habarka