2802

From: Keith Leydig [kleydig@outdrs.net]
Sent: Friday, January 08, 2010 9:44 PM
To: EP, RegComments; Hanger, John; johanger@state.pa.us
Subject: Fw: proposed rulemaking to amend 25 Pa.Code Chapters 121 and 123 (relating to general provisions; and standards for contaminants) to add requirements for the control of particulate matter emissions from outdoor wood-fired boilers

Environmental Quality Board,

I emailed the below comments pertaining to the subject matter on December 17, 2009 and have not received an acknowledgement of receipt. I am retransmitting the comments and would like to make an additional comment.

I feel that the local municipalities of the Commonwealth would be better suited to address the use of OWBs than the State as a whole. I urge you to abandon these proposed regulations.

Regards,

Keith Leydig
90 Kerrs Rd,
Carlisle, Pa. 17015

----- Original Message -----
From: Keith Leydig
To: RegComments@state.pa.us
Sent: Thursday, December 17, 2009 5:49 PM
Subject: proposed rulemaking to amend 25 Pa.Code Chapters 121 and 123 (relating to general provisions; and standards for contaminants) to add requirements for the control of particulate matter emissions from outdoor wood-fired boilers

Environmental Quality Board,

I would like to comment on the proposed changes to 25 Pa. Code, Chapters 121 & 122, Outdoor Wood-Fired Boilers. I bought my current house in 2007 and the only heat source was an outdoor wood burner (OWB). I found it to be extremely efficient and my electric bills during the winter months was almost 50% of the summer months' electric bills. The OWB also heated my domestic water, therefore the electric hot water heater did not have to heat as much. Last winter, the OWB developed a water leak and it needed replaced as it was manufactured in 1995. After much research into other types of heating furnaces, I decided to purchase another OWB at a cost of over $8,000.00.

I am concerned about several of the proposed changes. If I understand them correctly my new OWB would not be "grandfathered" in and I would have to replace it again. My OWB is also equipped with an oil burner as a back-up in case the wood or coal fire goes out. The manufacturer of my OWB, Mahoning Outdoor Wood Furnace based in Pa., recommends operating the OWB year round to extend the life of the unit. This eliminates the hot & cold cycles that effects the construction material of the OWB. This also assists in lowering electric costs during the summer as my domestic hot water would be heated by the OWB. I do not burn wood or coal during the summer months, but I do lower the thermostat on the OWB that kicks in the oil burner (to 100 degrees). If a restriction is placed on operating OWBs during the summer months, I would urge you to consider making the use of attached oil, propane or natural gas burners, an exception.

The next proposed change that concerns me is the list of "Allowed Fuels". It eliminates the use of coal. I burn mostly wood in my OWB, but I do use coal during the exceptionally cold periods. It burns long, hot and emits no noticable odor or smoke. Also with Pennsylvania having large coal reserves and the coal industry employing many Pennsylvanians, I find it hard to believe that state government would try to restrict it's use. I would also urge you to reconsider eliminating the burning of household waste on the state level. I believe that there are some townships that allow outdoor "pit" burning.

As for the proposed change on the height of the smoke stack, I feel that they are unreasonable. In my case, I have a neighbor that lives uphill from me and very close to 500'. If I find that their house is within 500', then I would have to extend my stack to approx. 50 to 75 feet. There would be no way to service a stack that high and it would affect the efficiency of the OWB.

In closing, I would like to add that I have not had any complaints from the five neighbors that are within 1,000 feet of my OWB. I am utilizing a heat source that is by far cheaper than foreign oil and greatly reducing my use of electricity. I urge you to "grandfather" all existing OWBs and reconsider some of the proposed changes that I outlined above.

Sincerely,

Keith Leydig
90 Kerrs Road
Carlisle, Pa. 17015
717-226-1400