From:

Marty Thornton [Marty.Thornton@foremangroup.com]

Sent:

Wednesday, January 20, 2010 5:09 PM

To:

EP, RegComments

Subject:

Proposed Rulemaking for Outdoor Wood Boilers

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INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Sirs/Madams,

It has come to our attention that the Commonwealth of Pennsylvania is considering legislation regarding outdoor wood boilers (OWB) and other forms of wood heating.

There are many law abiding, tax paying citizens across the Commonwealth heating their homes with wood heat. Many of them use OWBs. Owners of these units cannot unite to fight for our rights to heat with wood. The opposition is organized usually funded by natural gas, propane and oil producers. Why? Because those of us heating with wood are not paying them to heat our homes. The EPA and the Northeast States for Coordinated Air Use Management (NESCAUM) are also publishing data stating how bad the smoke is from OWBs. Not saying their data is wrong, but how it is obtained is not real life. You would need to stick your head into the boiler's stack to get their results. Their results state that the smoke for burning wood is worse than burning oil. Being in the architectural/engineering field, I have a hard time believing this. They are talking about the particulate count and not the real culprit, the gases that these elements put off. The gases from wood do not harm the environment but the gases from oil, propane, coal, and natural gas do harm the environment.

We have been heating our home with our OWB for two years and live on 13 acres. We are at least 300 feet from our neighbor's house and well off the property lines. Our neighbor has told us that they never smell the smoke from our OWB. Our unit is 75 feet from our home. People will state that it is too close because the smoke will creep into the house. That has never happened, however our stack is at least 10 feet above the ground. Why would we want to put it farther from our house? We need to fill the OWB with wood at least two times a day and do not want to walk far. Also, the farther away from the house the more chances for heat loss from the underground water lines.

OWBs do smoke but not a lot as others will have you believe. OWBs are not meant for urban areas and we agree. Municipalities should be the ones that should regulate the use of OWBs, not the state government. However, if you see fit to pass legislation please do it sensibly. Gather all the facts on heating your home with wood. Contact owners of OWBs and understand their reasoning to have such units. They are a lot of work, but the heat is much better and better on the environment than burning fossil fuels. The byproduct of burning wood is not detrimental to the environment. If this smoke is bad, then why are we not feeling the affects of the California wild fires? Also, fireplaces would then be bad. Our other neighbors heat with wood in their in-house wood burners and fireplaces. Are they next?

Finally, existing OWBs should be grandfathered in. If the state impose legislation that will make our OWB illegal, then the state will make criminals out of hard working people trying just to heat their homes without paying an arm and leg to the big fuel companies. Please keep these people in mind when voting for any legislation on OWBs. Remember, its just wood.

Sincerely, Martin and Suzanne Thornton 3615 Old State Road New Castle, PA 16101

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