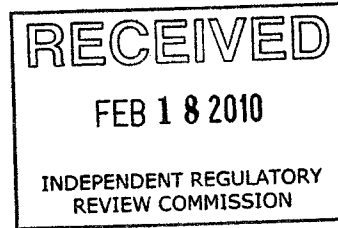


Grindelwald  
Tasmania  
Australia. 7277

2802



9<sup>th</sup> February 2010

Environmental Quality Board,  
P.O. Box 8477  
Harrisburg, PA 17105-8477  
[regcomments@state.pa.us](mailto:regcomments@state.pa.us)

Dear Chairman and Members of the Board,

**IRRC#: 2802 - Outside Wood-fired Boilers**

Thank you for the opportunity to make this submission.

The Regulatory Analysis Form is clear and comprehensive and for this you must be congratulated.

**Preliminary:**

You will notice I do not live in your country, however, fine particle pollution, i.e., PM2.5, from wood burning is the same the world over. There is no difference between someone suffering the terrible deliberate effects of smoke inhalation in your country or mine. We have some 46,300 wood burning units in our small state.

I have suffered serious long term health problems as a result of fine particulates from wood burning, hence my interest in the matter. In actual fact I feel I am fortunate to be here to share my experience with you. *“Epidemiological studies have shown a significant correlation between elevated PM2.5 levels and premature mortality.”*

**E: Summary of Regulatory Revisions:**

I agree with the proposed revisions save for:-

**Section (d) & (e): Stack Height:**

10 ft is insufficient and needs to be greater if one rule is to fit all. It needs to be higher to allow for temperature inversions experienced in some areas of the Commonwealth and to take into account the following:-

*The lifetime of PM 2.5 particle pollution is from days to weeks and their travel distance ranges from 100 to greater than 1000 kilometres (NRDC, 2000)*

Manufacturers/installers would need to ensure structural strength, and I would propose 20 feet from ground level to the top of the stack as a minimum, along with your other proposed conditions.

(2)

**Health and Amenity:**

We know that, "*OWBs are a widespread source of P and the smallest OWB has the potential to emit almost 1 1/2 tons of PM every year.*" It is estimated there are half a million OWBs in 2010 that produce 874,000 tons of Pm2.5 annually.

If a total ban on OWBs is not an option, I support your proposed rulemaking that would reduce the problems associated with the operation of OWBs, including smoke, odors and burning prohibited fuels and wastes including garbage, tires, hazardous waste and the like. In doing so it would assure that all of the citizens of your Commonwealth will benefit from reduced emissions of PM2.5 and air toxics from OWBs and that the reductions in ambient levels of PM2.5 from the use of OWBs would promote improved human and animal health and welfare, improved visibility, decreased soiling and materials damage and decreased damage to plants and trees.

One should have the right to enjoy your own property.

**Cost:**

I believe financial rebates should be provided by State and/or Local Government to significantly help users and owners comply with the new Phase2 standard.

Costs to meet Commonwealth environment targets should not just fall heavily on the end user. This would impact significantly on fixed income families.

The Federal Pollution Prevention Act of 1990 established a National policy that promotes pollution prevention as the preferred means for achieving state environmental protection goals. Whilst cost is always a consideration, particle pollution must be reduced at the source and this needs to be done by rulemaking.

I believe any final rule should include a seasonable prohibition to operate OWBs between the dates of May 1 and September 30 to address air quality issues of heaters smoking when "throttled back."

I would ask the Board to adopt the final rulemaking, and to submit it to the EPA as a revision to the State Implementation Plan.

Yours sincerely,

Clive M. Stott

Clean air is one of our most precious resources, essential for our survival and quality of life.

<http://www.cleanairtas.com>

**From:** cleanair [cleanair@cleanairtas.com]  
**Sent:** Tuesday, February 09, 2010 9:55 AM  
**To:** EP, RegComments  
**Subject:** Regulation Comments  
**Attachments:** wood boilers PA.doc

IRRC

Dear Sir/Madam,  
Details attached.....  
Thank you.

Kind regards,  
Clive Stott

