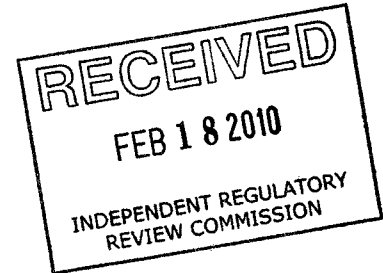


**From:** RQH [rhanham@windstream.net]  
**Sent:** Wednesday, February 10, 2010 12:55 PM  
**To:** EP, RegComments  
**Cc:** davidm@centralboiler.com  
**Subject:** Proposed DEP Regulations for Outdoor Wood-fired Boilers

**Comments on the Proposed DEP Regulations for Outdoor Wood-fired Boilers**

**Dr. Robert Hanham  
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**10 February, 2010**



I own a wood-fired boiler. It was installed in 2001. It is the only source of heat for my rural home in Greene County. My comments on the proposed DEP regulations for outdoor wood-fired boilers are as follows:

1. It is unfair and unreasonable to make these regulations retroactive for homeowners who invested in a boiler to heat their home years before the regulations come into force.
2. These retroactive regulations will place an extremely unreasonable economic burden on homeowners who will have to switch to another heating system if they can not abide by the new rules. In my case, the current annual cost of heating my home (including water) by wood-fired boiler is virtually zero dollars (\$0). If I have to switch to propane or electric (I do not have access to natural gas), not only will I have lost several thousand dollars invested in my current heating system, but my annual heating bill will rise to thousands of dollars. That is not only a very serious economic hardship, but doubly so for someone due to retire this year and about to exist on a fixed pension.
3. The proposed retroactive regulations require that the boiler's stack extend at least 2 feet above the highest peak of the highest residence located within 500 feet of the boiler. In my case, the only residence located within 500 feet of my boiler is my own residence! My nearest neighbor's residence is located half a mile from my boiler (this is not an exaggeration). Why on earth should I be subject to these regulations and the very substantial costs of switching to another heating system when the only person who lives within a half mile of my boiler is me, and only me?
4. If I am required to retrofit my boiler by building a stack that extends 2 feet above my own house, the stack will be so high that it will inevitably be subject to freezing and blockage (and I am writing this after we have just had two feet of snow). The result will be catastrophic for the boiler, as well as for my wife and I (my wife is disabled, so I don't take kindly to anything that further threatens her wellbeing, let alone my ability to take care of her).
5. It is an unreasonable economic burden to prohibit the use of a boiler during the summer. I use it to heat water in my home. It saves me a lot of money every year (again, soon to be on a fixed pension). If I am not able to use my boiler, I shall otherwise have to give a large sum of money to Allegheny Power every summer for the privilege of heating water that currently costs me virtually nothing.

6. In my capacity as a (research) university professor (of 37 years) who has taught a course on climate change, pollution and the atmosphere for many of those years, I cannot believe that any intelligent analyst would argue that forcing people to switch from using a very small wood-fired boiler to using commercially produced coal-fired electricity or gas would not worsen air pollution (let alone pollution of groundwater, lakes, rivers and soil). Given the likely outcome of forcing people to switch heating systems, this regulation makes little sense environmentally.
7. If forced to give up my wood-fired boiler, I would probably have to switch to electricity. In Greene County, that means buying it from a massively large, coal-fired power plant. Not only would my expenses go up considerably, but I would also be contributing to one of the worst polluters of the atmosphere anywhere. The biggest coal-fired power plant in Greene County alone emits about 15 million tons of global warming causing carbon dioxide annually. In addition, according to EPA's Toxic Release Inventory, Greene County's coal-fired power plants annually emit the following toxic pollutants into the air: 2455 tons of hydrochloric acid, 413 tons of sulfuric acid, 5 tons of selenium, 2.5 tons of barium, 1.6 tons of zinc, 1 ton of vanadium, 0.9 ton of manganese, 0.7 ton of arsenic, 0.6 ton of lead, 0.6 ton of nickel, 0.5 ton of copper, 0.2 ton of cobalt, 0.2 ton of mercury (until very recently, when the largest plant was forced to install scrubbers), 0.1 ton of chlorine and small, but lethal, amounts of dioxin. It's environmentally and socially indefensible for me to be adding to this pollution problem.
8. Finally, if wood-fired boilers really do need to be regulated (and obviously they do in urban settings), then doesn't it make more sense for local governments to do so rather than having a state-wide regulation which fails to account for what is, after all, a very local problem.