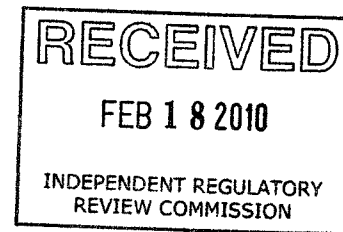


**From:** Linda Karr [lindakarr@live.com]  
**Sent:** Friday, February 12, 2010 8:17 AM  
**To:** EP, RegComments  
**Subject:** Re: Proposed rulemaking [25 PA. Code CHS 121 and 123] Outdoor Wood-fired Boilers

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



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

Dear Board,

Please proceed with your proposed rulemaking regarding outdoor wood-fired boilers. I believe this is long awaited and would be acceptable to the Commonwealth of Pennsylvania for the following reasons:

1. Although wood is a fuel that has been used since the beginning of recorded history, emission of particulates from wood burning is a hazard to health. Wood burning contributed to shortened lifespans of earlier generations, and today causes multiple health problems including early death, circulatory problems, heart and lung problems, cataracts, and asthma.
2. Wood burning and wood smoke harms the environment. Wood smoke is a form of Black Carbon. Black carbon (soot) is the second leading cause of global warming and stopping particulates is the quickest way to slow climate change. Black Carbon is on the U.N. list of greenhouse pollutants, and is proven by many scientific studies to act as harmfully as many greenhouse gases, surpassed only by CO<sub>2</sub>. The U.S. house of Representatives recognizes it as an agent harmful to the environment in the Black Carbon Reduction Act contained in the Climate Bill (ACES) passed in June 2009, and the U.S. Senate recognized the harm it causes by passing the Black Carbon Study Act in September 2009. Most climatologists agree. In saying this, we do not dispute that fossil fuels do harm the environment. Like fossil fuels, wood also adds greenhouse gases to the environment, notably CO<sub>2</sub>, just as fossil fuels do. The State of Massachusetts has a 2010 ballot question to forbid biomass burning to get a "renewable" label if it generates too much CO<sub>2</sub>.
3. The proposed regulation was prepared using extensive scientific data which has been ignored for too long because of lobbying of outdoor wood boiler sales departments. The dollar should not be allowed to trump human health. We will pay more in health care expenses for every dollar we put in the pockets of the outdoor wood boiler industry.
4. This regulation will NOT damage the economy of Pennsylvania by killing jobs. Those who work for the outdoor wood boiler industry may lose jobs if they do not diversify, but many outdoor wood boiler manufacturers also manufacture natural gas furnaces, which could replace outdoor wood boilers, so the economic cost to the manufacturers who anticipate future use could be breaking even. The new green economy of geothermal, solar and wind power for heat is vital to the future economic growth of Pennsylvania. As mentioned before, supposedly low cost heating for the few should not determine a policy of high health care costs and debilitating illness for their many neighbors. The cost of natural gas has gone down dramatically in the last year, and reserves ensure the low cost of natural gas as a "bridge" to the future better residential heating energy sources of geothermal, solar and wind. Natural gas prices will continue to remain low because of vast reserves of natural gas recently discovered in the United States. In the event electrical power lines are down, electricity can be generated by a natural gas backup generator.
5. The Commonwealth consists primarily of heavily-wooded, rural areas. These trees are a valuable natural resource when alive, and of much less value when cut. Trees provide oxygen and naturally cleanse the air. Tourism is hurt when smoke fouls the air. It makes no sense to apply clean air regulations ONLY to those in densely populated areas. Air moves freely and affects everyone, which is why a statewide rule must be written. The procedure leading to regulation of local outdoor wood boilers in Pennsylvania and across the nation by local municipalities of densely populated areas and rural areas alike has been long and difficult for neighbors whose health has been affected by outdoor wood boilers. Local outdoor wood boiler owners have sat on boards that determined the outcome of complaints about their own boilers, with resulting conflict of interest, and with resulting inaction or weak laws. Outdoor wood boiler manufacturer sales representatives have met with local boards to try to shape legislation so that local outdoor wood boiler laws are weak and unhelpful, all in the name of making a profit. Advertising for outdoor wood boilers is not countered by public service announcements on the health hazards of wood smoke. Those kinds of public service announcements have been made about cigarette smoking for decades, and outdoor wood boiler wood burning smoke has been unaddressed, to the detriment of public health and peaceful enjoyment of property.

Thank you,  
 Linda Karr  
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