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From: Derek and Leigh Thomas [dandlthomas@neok.com]
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To: EP, RegComments
Subject: Outdoor Wood Boilers Proposed Rulemaking

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INDEPENDENT REGULATORY
REVIEW COMMISSION

For the love of God, man, and our planet, please stop the use of Outdoor Wood Boilers (OWBs)! Families I know and love are being subjected to this catastrophe and it is a crime!

A significant and growing source of PM_{2.5} emissions in Pennsylvania is from OWBs. OWBs, also referred to as outdoor wood-fired furnaces, outdoor wood-burning appliances, or outdoor hydronic heaters, are free-standing fuel-burning devices designed: (1) to burn clean wood or other approved solid fuels; (2) specifically for outdoor installation or installation in structures not normally intended for habitation by humans or domestic animals, such as garages; and (3) to heat building space or water by means of distribution, typically through pipes, of a fluid heated in the device, typically water or a water and antifreeze mixture. OWBs are being sold to heat homes and buildings and to produce domestic hot water..

The emissions, health effects and the nuisance factor created by the use of OWBs are a major concern to the PA DEP. The Northeast States for Coordinated Air Use Management has conducted stack tests on OWBs. Based on the test results, the average PM_{2.5} emissions from one OWB are equivalent to the emissions from 205 oil furnaces or as many as 8,000 natural gas furnaces. Cumulatively, the smallest OWB has the potential to emit almost 1 1/2 tons of PM every year. Of the estimated 155,000 OWBs sold Nationwide between 1990 and 2005, 95% were sold in 19 states, of which PA is one. Unlike indoor wood stoves that are regulated by the EPA, no Federal standards exist for OWBs and the majority of them are not equipped with pollution controls.

Leigh Maria Thomas
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