## RECEIVED

Matthew Kiner 305 Lewisberry Court Lewisberry, PA 17339 February 8, 2010

FEB 1 1 2010

**ENVIRONMENTAL QUALITY BOARD** 

Environmental Quality Board Re: Proposed Rulemaking to amend 25 Pa. Code Chapters 121 and 123 P. O. Box 8477 Harrisburg, PA 17105-8477

RECEIVED
FEB 1 9 2010

INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Sir or Madam:

Enclosed are my comments in regards on the proposed rulemaking to amend 25 Pa. Code Chapters 121 and 123 (relating to general provisions; and standards for contaminants) to add requirements for the control of particulate matter emissions from outdoor wood-fired boilers, published at 39 Pa.B. 6068 (October 17, 2009).

I have kept my comments to a single page so they can be provided to each member of the Board in the agenda packet distributed prior to the meeting at which the final regulation will be considered.

Sincerely,

Matthew Kiner

Matter C Vine

My next door neighbor installed an OWB approximately 30 feet from my house in October 2005. Since that time my family has had to deal with high levels of smoke pollution on my property. The unit is generally operated from the end of October until the middle of April. To mitigate the wood smoke that seeps in, I have taken a number of steps to make my house more air-tight. The ground-level windows in my basement have to be covered with plastic and taped. I have added weather stripping and caulking material to every window and door to make them as tight as possible. I found that a negative draft created in the exhaust flue of the gas water heater was drawing dirty air into my basement. To counteract this I have mounted a fan on the outside of the flue to prevent the draft from forming. We have bought air cleaners for every floor of the house. I have used spray insulation to seal the interior basement walls where they meet the exterior sheathing, as I found some of the seams were drafty and allowed bad air in. My house was built in 1999 and I didn't consider it drafty prior to the OWB installation.

Despite my efforts the smoky odor persists as it is impossible to make a stick-frame house 100% airtight. I have an infant child and I am concerned about the effects on her health. As for me and my wife, we cannot enjoy the use of our own yard, as very often our clothing reeks of smoke after spending any amount of time outdoors. In 2007 I suffered an asthma-like attack brought on, almost certainly, from inhaling smoke particles while I was doing a chore in my yard. I went to the ER and needed an inhaler for weeks afterward.

In 2006 my borough passed an ordinance banning future OWB's, but grandfathered existing units and added a stack requirement. In my case the stack height was set at 20 feet. This does little to mitigate the effects of the smoke, since the same amount of material is ejected, just at a higher elevation. The proposed rulemaking will be effective in preventing new OWB's from being installed in locations where they will be likely to affect neighbors, but people like me who live next to existing units aren't being adequately protected. My neighbor's stack is guyed to the OWB enclosure itself. Adding another 10-15 feet will result in a structure that has the potential to fall into my house if it collapses. My neighbor's first 20-foot stack collapsed, fortunately without landing on my property. It is obvious that the Board recognizes the danger of the particulate emissions that OWBs emit. I ask that the Board consider extending the setback requirement to all OWB installations, whether current or future units. Barring that, I would ask that the DEP be given the power to examine existing OWB installations on a case-by-case basis and determine if continued operation poses a public health risk.

One argument that OWB proponents make is that they mitigate the high cost of conventional fuel sources like natural gas, propane, and electricity. My neighbor told me that his unit was \$7000 plus an additional \$1000 in installation costs. He also has to purchase the wood that is burnt, which greatly extends the time it takes for the OWB to pay for itself. I urge the board to reconsider the affordability argument in light of the high cost of these units. I have seen advertisements for these units that offer financing to prospective owners, which would yet again extend the payback period when taking finance charges into account. If one can afford to purchase or finance a wood boiler then the financial wherewithal exists to invest in a cleaner heating source.

engapine and the control of the cont

Matthew Kiner Lewisberry, PA