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Pennsylvania
State Grange

February 3, 2010

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INDEPENDENT REGULATORY
REVIEW COMMISSION

1710
20 Erford Road, Suite 216
Lemoyne, Pennsylvania 17043
www.pagrang.org
email: pagrange@pagrange.org
717-737-8855
800-552-3865
fax: 717-737-8858

Environmental Quality Board
The Honorable John Hanger, Chairperson
PO Box 8477
Harrisburg, PA 17105-8477

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FEB - 8 2010

ENVIRONMENTAL QUALITY BOARD

RE: 25 PA Code Chapters 121 and 123, Outdoor wood-fired boilers

Dear Board Members:

I am writing on behalf of 12,000 members of the Pennsylvania State Grange to comment on the proposed rulemaking to add provisions to 25 Pa. Code Chapters 121 and 123 regarding outdoor wood-fired boilers.

Grange members feel that statewide regulation of outdoor wood-fired boilers is not needed at this time. Most of these boilers are utilized in rural areas where smoke is dissipated before reaching any neighboring residence. Where complaints have been filed, the local municipality may find it necessary to regulate location and smokestack height so the boiler use does not create a nuisance for neighbors. Since the Air Quality Act allows municipalities to adopt more stringent standards, the local approach will allow the municipality to adopt local ordinances specific to their communities' concerns as well as handle all nuisance complaints and enforcement of both existing and new boilers.

If the Board finds that the proposed regulations are needed, we ask that smokestack height not be required until research is conducted on the effect that excessive stack height will have on the burn efficiency of the boiler.

In addition, a catalytic converter-type installation could cause the boiler to burn cleaner, allowing the burning of prohibited fuels. These other wood products need to be disposed of on agricultural operations and will be burned in open fires if not allowed to be burned in outdoor wood-fired boilers. A catalytic converter would also be an alternative to high stack heights.

Thank you for the opportunity to submit comments on behalf of members of the Pennsylvania State Grange.

Sincerely,
Betsy E. Huber
Betsy E. Huber, President