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FEB 19 2010
INDEPENDENT REGULATORY
REVIEW COMMISSION

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FEB - 8 2010

Harrisburg PA 17101-2501

Or

ENVIRONMENTAL QUALITY BOARD

Email: RegComments@state.pa.us

Dear Environmental Quality Board,

I have chosen to heat my home with an outdoor wood furnace for a number of good reasons:

- With the ever changing price of home heating oil, natural gas and LPG, heating with wood is an economical option -- an owner that heats with wood in an outdoor furnace can save thousands of dollars a year on home, farm and small business heating costs.
- Heating with wood is consistent with the independent practices of Americans from as far back as colonial times.
- Heating with an outdoor wood furnace eliminates the risks of fires and carbon monoxide poisoning associated with an indoor heating system because the appliance is located outside. Every year literally thousands of homes are damaged or destroyed by fires caused by indoor heating devices.
- Heating with wood results in no net increase in global warming gas emissions. Heating with oil, coal and natural gas is a significant source of global warming gas emissions.

The proposed regulation for "outdoor wood-fired boilers" has the potential to impact my ability to continue utilizing my existing appliance. I am strongly opposed to:

- Excessive chimney height requirements for existing and new furnace installations that are not based upon science.
 - Excessive chimney height requirements are costly (parts and height determination), time consuming and may prevent a large number of owners from being able to comply.
- Seasonal prohibition between May 1 and September 30. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, greenhouse operations is unreasonable.
- Opacity requirements for residential sized appliances because opacity is a subjective visual observation.

While it is foreseeable that furnace owners creating verifiable nuisances need to increase their chimney to alleviate complaints, it is unreasonable for the Pa DEP to retroactively impose restrictions (with the exception of proper fuel use) on my existing outdoor wood furnace. My appliance was purchased, installed, and operated in good faith prior to the drafting of the regulation.

I am opposed to the excessive and retroactive requirements of the proposed regulation. If passed as currently written, I believe that the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that use these appliances in a responsible manner. I am supportive of a state law requiring existing furnace owners to have to comply with proper fuel use requirements and for regulations regarding new installations to be reasonable.

Sincerely,

Warren J. Roberts

Date: 41 Febr. 2010

Warren Roberts
HC 34, Box 7A
Warren Center, PA 18851

Attachment to petition letter dated 4 Feb 2010

Dear Environmental Quality Board,

I find your proposed regulation for "out door wood-fired boilers" particularly onerous, especially those specifying chimney height and set-back distances. The proposed regulations do not address any of the hundreds of thousands (or more) of indoor wood-burning appliances currently in use in the commonwealth. Any suggestion that these indoor devices are already in compliance with the proposed regulations for "outdoor wood-fired boilers" is totally false. I have determined that your proposed regulation is based on "junk science", unfair and discriminatory. Wood-fired heating devices do not pollute nearly as much as those utilizing petroleum based fuels.

Sincerely,

William J. Roberts

4 Feb. 2010