

#2802

Tate, Michele

From: DEAN ZOOK [boilerman@smokelessheat.com]
Sent: Tuesday, October 27, 2009 1:27 PM
To: EP, RegComments
Subject: Proposed rulemaking 25 PA code CHS. 121 and 123

Dear Air Quality Specialists,

I have seen this section in the proposed new regulations regarding outdoor wood boilers.

Annex A

TITLE 25. ENVIRONMENTAL PROTECTION

PART I. DEPARTMENT OF ENVIRONMENTAL PROTECTION

Subpart C. PROTECTION OF NATURAL RESOURCES

ARTICLE III. AIR RESOURCES

CHAPTER 121. GENERAL PROVISIONS

§ 121.1. Definitions.

Outdoor wood-fired boiler

(B) The manufacturer specifies for outdoor installation or installed in structures not normally intended for habitation by humans or domestic animals, including

structures like garages and sheds.

We sell **indoor** wood gasifying boilers as classified by the manufacturer that have been certified by the manufacturers to be 86% burn efficiency and in some cases higher. Sometimes these units are installed in a side building, utility space, barn or building adjacent to the home as opposed to installing in the basement as usual. This can be a preferred option to keep dirt out of house. If these indoor units are installed in an area other than the basement or in the home but in a space "not normally intended for habitation by humans or domestic animals" it seems you would class these indoor boilers to be an outdoor wood boiler.

The problem I see if they become classified as such the owner could not burn to keep domestic water hot during summer, because the dates of use in the proposal may prohibit use all year around. These indoor gasification boilers are designed to use all year long if needed to provide domestic water. There is a minimum of 400 gallons of accumulator water volume in a system that stores the burn cycle. This eliminates completely an idle or smoldering fire. A burn cycle (which is always about 3 1/2 hours) can easily go 3 days to a week between burns to provide the needed heat for domestic water. Winter time average burning are 2-3 burn cycles per day.

10/29/2009

RECEIVED
 10/29/09 11:46 AM
 DEPARTMENT OF ENVIRONMENTAL PROTECTION

Thank you for your consideration.

Dean Zook

Smokeless Heat LLC
2020 Cornwall Rd
Lebanon PA 17042
717-389-0083