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INDEPENDENT REGULATORY
REVIEW COMMISSION

ENVIRONMENTAL QUALITY BOARD

November 6, 2009

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Proposed restrictions of outdoor wood fired boilers

Dear Sirs:

As an owner of an outdoor wood fired boiler, I am dismayed by the proposed regulations. The terrain surrounding my home is hills and valleys. Your proposed requirement that I put a stack at least 2 feet above the highest residence within 500 feet is impossible to meet. A nearby residence is almost 200 feet higher than my outdoor boiler and my township limits structures to no more than 50 feet above exterior grade. Therefore it would be impossible to comply with your proposed requirements. The impossibility of complying with your regulations would either force me to use an indoor wood furnace/stove, which is more dangerous and creates just as much smoke, or to go back to using imported oil to heat my house, causing further damage to the US economy and the balance of trade.

Even the FAA restrictions for structures near Airports permits a gradual elevation for distances from the run way. (one foot in elevation for every 50 feet from the edge of the runway) There is no reason why you can't adopt a somewhat similar mathematical formula restriction to accommodate outer distances from the boiler. I would suggest that a stack requirement to roof height be lowered by 1% for every 3 feet beyond 200 feet from the boiler. That way if a house roof is 40 foot higher than the boiler at a distance of 410 ft. the boiler stack would need be only 12 feet above grade. $(410 - 200 = 210 \text{ feet divided by } 3 = 70\% \text{ reduction from } 40 \text{ feet high.}$ No matter what, your minimum stack height could stay at 10 feet. Such a formula would be fair to owners of existing boiler who will be required to retro fit their boilers with higher stacks. For instance, if my neighbor's house roof top on a hill is 200 feet higher than my boiler, but 470 feet away, my stack would be calculated as follows: $470 - 200 = 270$ divided by 3 = 90 % reduction in height or 20 feet high.

Sincerely,

