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Chambers, Laura M.

RECEIVED

From: Donald Aungst [ssgaungst@embarqmail.com]
Sent: Saturday, November 21, 2009 8:14 AM
To: EP, RegComments
Subject: PROPOSED RULEMAKING Outdoor Wood-Fired Boilers - 25 PA CODE CHS. 121 AND 123

2009 NOV 30 PM 3:33

INDEPENDENT REGULATORY
PA CODE CHS.

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 - a furnace 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 Pennsylvania Department of Environmental Protection (DEP) regulation (noted in subject line) for "outdoor wood-fired boilers" that 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 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. In specific cases the purchased unit may not be operable under the proposed restrictions, leaving home owners and with thousands of dollars invested in an appliance they cannot use.

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. The proposed stack regulations and set backs are aimed at outlawing a viable, safe means to heat our home.

Sincerely,

Donald Aungst

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11/30/2009