

DEC 7 REC'D

INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Comments on Proposed Rulemaking with regard to 25 PA Code Chapters 121 and 123 regarding Outdoor Wood-fired Boilers**

Although this proposed regulation appears to further justify my opinion that all bureaucrats and politicians in Harrisburg should be fired or removed from office, I will attempt to present some rational thoughts on the subject for your consideration:

1. While certainly there are locations in the Commonwealth where some regulations such as this may be applicable, there is no basis to justify a Commonwealth-wide regulation. Many local municipalities have already enacted similar regulations or prohibitions. Some of us live in more remote areas where our properties are 20 acres, 100 acres, 300 acres or more and I cannot possibly see the need for such regulations. It seems to me that any proposed regulations should be limited to counties in non-compliance and areas with population densities that require such regulations. Clearly there are areas where such devices need to be prohibited, but not state wide.
2. As a registered professional engineer I seriously question the estimate of 1-1/2 tons of PM per year per unit. Someone should do the math on how much wood needs to be burned at what percent ash to produce these emissions.
3. It seems to me that if a Commonwealth wide regulation is required (which I do not believe) there should at least be some minimum unit size (in Btu/hour) to which the regulation is applicable.
4. Wood (and associated wood products) is a renewable resource – oil and gas are not. The entire argument of burning oil and gas because they are cleaner is in conflict with development of sustainable fuels. Similarly, prohibition of burning of biomass in general (which seems to be the object of the proposed regulation) is inappropriate.
5. Many individuals living in remote portions of the Commonwealth burn wood for economic reasons in addition to the fact that it is a renewable resource. Forcing increased consumption of oil and gas seems counter productive, especially at this time.
6. A seasonal prohibition makes no sense to me for obvious reasons. If the boiler is properly installed and maintained for purposes of heating domestic water, why prohibit it from serving its intended function?
7. Your proposed stack requirements also make no sense to me as a professional engineer. Perhaps the 150' from a property line makes some sense in that it at least eliminates locating such a device on a postage stamp size property and reduces the impact on neighbors. Requiring a stack height of 2 feet above the highest peak of the residence within 150 feet is not based on sound engineering practice. The regulation as proposed for existing devices requiring 2' above the highest peak of a residence within 500 feet is ludicrous.

While I clearly understand that we cannot permit outdoor wood-fired boilers on every 50' by 100' building lot, I fail to see that this proposed regulation is appropriate either. I think you should have better things to do with your time or that your jobs should be eliminated in order to reduce the taxpayer burden and help to balance the Commonwealth budget.

Very truly yours,

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