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Tate, Michele

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From:

Short, James [JShort@nvrinc.com]

Sent:

Friday, November 27, 2009 11:12 AM

To:

EP, RegComments

Subject: Outside furnace

DEC 7 RECT

INDEPENDENT REGULATORY REVIEW COMMISSION

To Whom It May Concern:

Recently it has come to my attention that there is a proposal to increase regulations on out side boiler furnaces. Though I would agree it is important to protect our environment and be mindful of our neighbors I find the mandates to be ridiculous and outrageous! As the proposal is written potentially ones outside furnace would require a chimney higher than that of a chimney located on the house that the furnace is attached. This does not seem correct especially when seeing one of these furnaces in use. The average outside furnace will only burn at most once an hour for approximately 10 minutes. The rest of the time the fire is maintained by back draft usually creating no smoke at all and at worst creating a fine but visible smoke trail of 3-4'. In comparison a regular house fire place or wood stove has a constant burn always creating smoke and emissions. It is also note worthy that an outside furnace requires less wood to heat a house than a conventional in house system and I make this comment having operated both. In closing, I request that these proposals be revaluated to make sense and become honest in their intention and not outlaw a quality modern piece of equipment witch benefits far exceed conventional in house fireplaces.

Thank you for your time and concern

JAMES D. SHORT

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