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Tate, Michele

From: Frederick, Kent J [kent.frederick@dhs.gov]
Sent: Wednesday, November 25, 2009 2:51 PM
To: EP, RegComments
Subject: Proposed Restrictive Outdoor Wood Furnace Rule

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Environmental Quality Board:

I am writing to voice my opposition to the proposed rule that will affect current and future owners of outdoor wood-fired boilers. I believed your proposed rule in short sighted, illogical, discretionary and lacks sound scientific basis. Fro the reasons I will set out, I wish you to reexamine this proposed rule with a goal to strike it.

See title 25 Environmental Protection, Part I Department of Environmental Protection, Subpart C. Article III, Chapter 121 and 123.14.

The new rule will affect all preexisting users and future owners of outdoor wood-fired burners. The new rule requires new setback provisions for Chimney height to be two feet above the highest residence located within 500 feet of the boiler. The proposed new rule also sets seasonal limitations on when the wood furnace may be utilized which would be a hardship on northern Pennsylvania residents. Additionally, the opacity requirement is open to discretion which could easily be abused.

I have no idea what is behind this retroactive rule, but it if has any basis on the environmental impact, I cannot imagine the environmental impact of burning wood is more than the environmental impact of heating oil that must be transported across the ocean from hostile counties, refined, and shipped to homes with questionable holding tanks. I don't need to outline the reasons this country needs to decrease its dependence on foreign oil, but why there is more regulation to preexisting owners of wood furnaces? This makes absolutely no sense where the fuel, "wood" is abundant, natural, and otherwise would end up in a landfill or rotting away in woodlands. I cannot understand this rule punishing outdoor wood burners, which are safer and more efficient, when there is no such rule on indoor wood stoves or pellet burners. Indeed, their emissions can come out of a one story ranch house chimney.

While I believe I am already in compliance with this new rule, the principle of the matter greatly infuriates me. There may preconceived notions of who uses such wood fired boilers. However, included in the rural property owners are small business owners using this source of heat for their suburban businesses and home, as well as professionals, like me. I became disgusted at using heating oil to heat my house for two principle reasons, supporting foreign countries that have no love of the United States, and the very high cost of heating oil. I converted to this source of heating two seasons ago. Now the thousands of dollars I use to spend on oil, I now invest to hopefully be able to pay for my children's future college education which will be a small fortune by the time they will matriculate. What particularly annoys me is that there is no science or logic behind this rule. This rule would go further to harm the already hard pressed business owners and families, not to mention the American companies producing these devises. This country does not need any more regulations that are bad for business and bad for families.

I find no logic or science for me to have a three story chimney attached to my wood-fired outdoor furnace. Indeed that would probably increase the "opacity" of the otherwise benign structure. I see the

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proposed rule as increasing our dependence on foreign oil, and possibly making many other owners that wish to be energy independent being unable use this costly devise. At the very least, this rule should have a grandfather clause. If this rule is passed as currently written, I believe the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that use these appliances in a responsible manner. However, I do support a state law requiring existing furnace owners to have to comply with proper fuel use and for regulations regarding new installations to be reasonable.

Please reconsider the proposed rule.

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