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Tate, Michele

**From:** Donya Mealy [donyamealy@yahoo.com]  
**Sent:** Wednesday, November 25, 2009 8:32 AM  
**To:** EP, RegComments

INDEPENDENT REGULATORY  
 REVIEW COMMISSION

**Subject:** PROPOSED RULEMAKING 25 PA. CODE CHS. 121 AND 123 Outdoor Wood Boilers 39 Pa.B. 6068 Saturday, October 17, 2009

## PROPOSED RULEMAKING 25 PA. CODE CHS. 121 AND 123 Outdoor Wood Boilers 39 Pa.B. 6068

Nathan and Donya Mealy  
 174 South Avenue  
 Bradford, Pa 16701

Dear Environmental Quality Board,

I have chosen to heat my home with an outdoor wood furnace for a number of reasons:

1. With the ever changing price of home heating oil, natural gas and LPG, heating with wood is an economical option - an owner that heats with wood in an outdoor furnace can save thousands of dollars a year on home, farm, and small business heating costs. Last year our monthly natural gas bill on the budget was \$420.00. That added up to \$5040 for the year. On an one income budget, this was an extraordinary amount and we were not eligible for any assistance due to having too much income during the previous year.
2. Heating with wood is consistent with the independent practices of Americans from as far back as colonial times.
3. 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. Also, using an outdoor wood furnace has less health risks associated with lung problems such as asthma, COPD, emphysema, chronic bronchitis and chronic pneumonia
4. 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 regulation for "outdoor wood-fired boilers" has the potential to impact my ability to continue utilizing my existing appliance. I am strongly opposed to:

1. 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

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consuming and may prevent a large number of owners from being able to comply.

2. Seasonal prohibition between May 1 and September 30. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, and/or green house operations is unreasonable. We use our wood stove to heat our water all year long. The seasonal prohibition would inhibit our ability to have warm/hot water for our daily needs.

3. Opacity requirements for residential sized appliance 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.

I am opposed to the excessive and retroactive requirements of the proposed regulation. If passed as currently written, I believe that the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that use these appliance in a responsible manner. 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.

Sincerely,

Nathan and Donya Mealy

November 22, 2009