

2802

Tate, Michele

RECEIVED

From: Shawn Metcalf [sametclf@msn.com]
 Sent: Sunday, November 29, 2009 10:24 AM
 To: EP, RegComments
 Subject: Outdoor Wood Furnace

DEC 7 REC'D

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear 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 furnace eliminates the risk 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 destroyed or damaged by fires caused by indoor heating devices.
- Heating with wood results in no net increase in global warming emissions. Heating with oil, coal, and natural gas is a significant source of Global warming emissions.
- Wood is a renewable resource.

The Pennsylvania Department of Environmental Protection (DEP) has proposed a regulation 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 NEW AND EXISTING 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 1 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.

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 appliances 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,
 Shawn J. Metcalf

12/4/2009