

2802

Tate, Michele

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From: wobrien@zoominternet.net
Sent: Wednesday, November 25, 2009 3:00 PM
To: EP, RegComments
Subject: 123.14 Outdoor wood-fired boilers

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Environmental Quality Board,

Please find my enclosed attachment concerning the proposed rule making regulations concerning 123.14 Outdoor wood-fired boilers. My attachment will explain my strong disagreement with the proposed rule making. I hope you will read my letter and take it into consideration when drafting such legislation. I will forward this message to this address on a weekly basis not as a sign of being a nuisance but to show my commitment to my rights as a resident of Pennsylvania who choses to heat my home and hot water with an outdoor wood-fired boiler.

I welcome any comments you might have regarding this proposed rule making.

Sincerely,

William F. O'Brien
852 Rhodes Lane
New Castle, PA 16101

2013

Dear Environmental Quality Board,

2802

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 heating costs.
- Heating with wood is consistent with the independent practices of Americans from as far back as colonial times.
- Heating with an outdoor wood 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 damaged or destroyed by fires caused by indoor heating devices. Not to mention the countless lives that are lost, including nearly losing my own wife and infant child due to carbon monoxide poisoning.
- 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 gas emissions.
- Heating with wood also reduces my energy consumption, due in fact that it also heats my hot water which lessens the amount of emissions the electric company produces.

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 existing and new 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 1st and September 30th. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, greenhouse operations is unreasonable.
- 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 PADEP 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 regulations. 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,
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