

Tate, Michele

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From: Gil Freedman [gil491@verizon.net]
Sent: Saturday, December 05, 2009 2:24 PM
To: EP, RegComments
Subject: Comments On Proposed Outdoor Wood Boiler (OWB) Regulations

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Please make these comments part of the record on subject proposed regulations, as expressed in the Proposed Rulemaking, [25 PA Code Chs. 121 and 123], Outdoor Wood-Fired Boilers, [39 PA B 6068] [Saturday, October 17, 2009].

I'm pleased the Commonwealth is developing a policy protective against emissions from OWBs. Wood burning is a renewable energy source that helps reduce our dependence on fossil fuel. But there are air quality and public health problems related to the use of OWB equipment.

I endorse your proposal and would recommend the following improvements:

Distance to property line should be increased to 500 feet.

My research suggests persons regularly exposed to emissions from even Phase II boilers are subject to significantly increased risk of cancer, respiratory complications and cardiovascular effects, up to distances of 500 feet.

Existing units should be phased out. They're worse than Phase II and currently constitute a health threat.

Units should be prohibited from operating during summer months unless fired at full power.

Trash burning should be severely punished.

Some sort of periodic inspection is necessary to detect performance degradation. Wood stoves, while cleaner, have demonstrated degradation in a short time.

I suspect that the technology inherently cannot burn cleanly enough to not be a health hazard, without the application of a catalytic oxidizer and frequent inspection.

My qualifications. I have served as an expert in several nuisance and zoning violation cases in the Commonwealth. I am a registered engineer in Pennsylvania and Virginia and hold a Master's degree in mechanical engineering from Stanford University and a Bachelor's degree in mechanical engineering from Penn State. I have special training in air pollution control from the University of Southern California School of Public Administration.

Respectfully,

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12/7/2009