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ENVIRONMENTAL QUALITY BOARD

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Environmental Quality Board
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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Sirs;

I have serious concerns about the proposed rules governing "Outdoor Wood Burners". The proposed rules for manufacturers to improve their products to be more efficient and less polluting are understandable and acceptable. However, the rules for use are unrealistic, unfair and unworkable. To impose these rules on existing users would be the same equivalent as the power company pulling the plug on residents who depend on electricity to heat their homes.

It is impossible to write rules that are equally fair and workable for residents who are located in Cities, Towns, Townships, and Farms. The use of OWB's and the effect on neighbors is different for each location.

Suggestions:

1. **Applicability:** The state should set any rules for the manufacturer and let the use rules be determined by the local municipalities.
2. **Farm use:** Since colonial days, farmers have burnt fallen trees or brush piles. With or without OWB's this burning will continue. One forest fire could cause more air pollution than all the OWB's in the state. There should be an exemption for farmers with more than a specified acreage, probably about ten acres.
3. **Setback requirements;** 150 feet may be reasonable in a populated area but many rural users have boundaries with mountain land, Farmland, state Game land etc. Change this to a specified distance to an occupied dwelling.
4. **Smokestack Height:** 2 ft. higher than any residence within 500 ft. for existing users is excessive, (especially if his neighbor lives uphill), and would shut down many furnaces unnecessarily. Make the distance less and/or base the requirement on the receipt of a complaint.
5. **Acceptable fuels:** Coal should be added to the list. It burns clean. It's plentiful, and it saves oil.

Your serious consideration of these changes will be appreciated.

Thank you.


Larry A. Kaufman

cc: Sen. Jeffrey Piccola
Sen. John Gordner
Sen. Mike Folmer
Rep. Sue Helm