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Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

INDEPENDENT REGULATORY
REVIEW COMMISSION

DEC 10 2009

**RE: Proposed State Regulations
for Wood Fired Boilers**

ENVIRONMENTAL QUALITY BOARD

Ladies/Gentlemen:

I am writing to provide the following comments regarding the proposed State regulations to restrict the use of wood fired boilers in Pennsylvania:

1. The proposed regulations will limit the use of wood as a fuel resulting in many families being forced to use more expensive means of heating their homes, such as with oil, gas or electricity.
2. Wood is an acceptable "green" energy fuel and does not have a carbon footprint as compared to oil, gas and electricity.
3. Homeowners are already facing increased energy costs due to the electric and natural gas deregulation legislation.
4. The requirement to have high stacks is unsightly, costly and unnecessary when boilers are designed to meet Phase 2 emission requirements.
5. There are thousands, if not millions, of wood burning fireplaces, wood burning boilers and other types of wood burning units which this regulation does not address. It is totally unfair that our State regulators are only focused on outside wood boilers and not addressing issues related to other types of wood burning devices.
6. Existing wood fired boilers should be grandfathered from meeting any new regulatory requirements. It may not be cost effective to retrofit an existing unit.
7. Every wood fired boiler installation is site specific. No law or regulation can be written to fairly address each and every possible scenario regarding the installation and operation of a wood fired boiler.
8. Issues related to wood fired boiler installation and operation should be handled at the local level, not at the State level.

If you have any questions, please do not hesitate to contact me.

Sincerely,



LaRue S. VanZile, P.E., P.L.S.
2680 Mountain Ridge Road
Mainesburg, PA 16932

C: Representative Matt Baker