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December 16, 2009

Proposed Rule Making
[25 PA. Code CHS. 121 and 123]
Outdoor Wood-Fired Boilers

Environmental Quality Board
P. O. Box 8477
Harrisburg Pa 17105

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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ENVIRONMENTAL QUALITY BOARD

Dear Board Members,

I would like to thank the Board for accepting my comments and objections to the proposed regulations. After reading the Proposed Rulemaking [25PA.code CHS. 121 and 123] Outdoor Wood-Fired Boilers, I am somewhat confused as to whether this rule making applies to existing furnaces or new installations only. After speaking to Ron Davis, Chief, Division of Compliance Enforcement, Bureau of Air Quality on Dec 8, 2009, I got the impression that this was for new installations only. I am also confused by the definition under section 121.1 of an Outdoor wood-fired boiler. Is it referring to a unit that was designed to burn only wood (no coal grates) or is it referring to any outside fired boiler. The outside furnace I have is designed to burn coal (has coal grates), but as with and coal furnace, inside or out, you can burn wood. An outdoor boiler designed for only burning wood has no grates, therefore you cannot burn coal, there's a big difference.

If I am wrong in my assumption that the rulemaking applies only new installations, then just in my neighborhood in rural southern Somerset County there are 5 families all within 1000 feet of each other that this will affect. The proposed rulemaking will basically ban all 5 of us from using the outside furnaces. Under Section 123.14(e)(ii) *Stack height requirements for existing outdoor wood-fired boilers* it would be impossible from a financial and engineering stand point to have a stack height at least 2 feet above the highest peak of the highest residence located within 500 feet. An example would be of my own. The closest residence to my outdoor furnace is 325 feet away, by doing some basic surveying with a lock level, he is 15 feet higher in elevation than I am, his two story house extends 29 feet above the ground. That means my stack would need to be 46 feet high.

All the families mentioned above burn coal in outside boilers. All have between \$5,000 and \$10,000 invested. All depend solely on outside boilers fired with coal for heat and domestic hot water. Four of the families have no other source of heat. In southern Somerset County coal is plentiful, if our heat source is taken away or regulated beyond our means, we have no alternative except for oil or electric for heat, since gas is not an option. In a time when our country needs to become more independent of foreign oil, it would not be wise to regulate us to the point of changing from coal to other fuel sources. During an average winter each of the 5 families I'm referring to, burn an average of 10 tons of coal each. Since 1 ton of coal is equivalent to approximately 135 gallons of fuel, that's a savings of 6750 gallons of foreign oil. As with most owners of outside boilers, I am of lower income, which is why most families like me have installed outside boiler, to utilize cheap abundant coal. To regulate beyond our financial capability would put a huge burden on many families already caught up in a financial recession.

I think there needs to be some regulations on outside wood burners (furnaces). I feel they were never designed to be installed in Boroughs or anywhere where homes are in close proximity. I feel this could be dealt with in a more cost efficient manner if it was left up to local enforcement. It seems it would be much easier to grandfather existing units in as they are, and deal with problems on a case by case basis. This would create a lot less financial burden for owners of existing units that do not comply with stack height requirements. I feel that if good common sense and planning is utilized when installing the boiler and good clean fuel such as wood or coal is all that is used, they can be as environmentally friendly as an inside coal or wood furnace.

Thank You and Best Regards.

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