

Comments on proposed rulemaking (25PA. Code CHS 121 and 123) Outdoor Wood-Fired Boilers (39 Pa.B. 6068) (Saturday, October 17, 2009)

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This proposal should be revised to serve the best interests of the residents of Pennsylvania. Elected representatives do not reach state government through a unanimous vote, but, nonetheless, have a moral obligation to serve the best interests of all the people. I believe regulation of OWBs should have been by local governments after evaluation of problems on a case by case. This is especially true of existing units.

Portions of this proposal will have a major negative financial impact on many current OWB owners. Specifically, the requirement to have the stack height extend at least 2 feet above the peak of the highest residence located within 500 feet of the OWB. In many cases this requirement will vary from extremely expensive to nearly impossible. It accomplishes nothing where units are already installed in prevailing downwind air currents without complaints from neighbors. This height requirement does not exclude the residence of the OWB owner. An increased stack height might be needed where there are well established grounds for nuisance complaints by neighbors, but should not be a hardship rubber-stamped on the very large percentage of owners, who using common sense with concern for their neighbors installed their OWBs downwind. This regulation should not apply to outside propane burners as it is a very clean fuel.

The stack height requirement will not lessen total PM. In fact it is likely to cause increased resistance to airflow, inefficient combustion, and more total pollutants. The high stack height combined with the requirement for permanent attachment of the stack will make many flues nearly impossible to clean resulting in greater risk of fires and increased pollution. There are risks that fires in tower high stacks may cause them to topple over igniting nearby homes. There are all major risks of falls from elevated heights as owners attempt to erect very high stacks.

Existing OWB owners installed these units in good faith in compliance with regulations at the time of installation. Passing a regulation which will require many preexisting units to be removed from service will cause an extreme financial hardship on the owners. Some have in excess of \$10,000 invested. I have about \$16,000 in my OWB installation and it saves me about \$2,500 annually. There have been no complaints regarding my furnace. This is like passing a new residential building code and requiring all existing homeowners to tear down their residences and rebuild to the new standard. Many of the poorest rural families have installed these units to help them survive our harsh winters and avoid financial collapse. All existing owners who can not meet the new standard should be reimbursed for their loss. Now many will be forced to buy oil pumped from the soil of countries run by dictators. I thought these furnaces helped lower our dependence on such foreign sources. If this regulation does not permit burning of coal, then it will result in the removal of thousands of additional trees from our ecosystem and may cause job losses in the mining industry.

Much of this proposal is unreasonable. I respectfully ask that you reconsider.