

Environmental Quality Board
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Or

express mail:

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400 Market Street
Harrisburg, PA 17101-2301

Or

Email: RegComments@state.pa.us

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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DEC 23 2009

ENVIRONMENTAL QUALITY BOARD

Dear Environmental Quality Board,

I have chosen to heat my home with an outdoor wood furnace for a number of good reasons:

- With the ever changing price of home heating oil, natural gas and LPG, heating with wood is an economical option – an owner that heats with wood in an outdoor furnace can save thousands of dollars a year on home, farm and small business heating costs.
- Heating with wood is consistent with the independent practices of Americans from as far back as colonial times.
- Heating with an outdoor wood furnace eliminates the risks of fires and carbon monoxide poisoning associated with an indoor heating system because the appliance is located outside. Every year literally thousands of homes are damaged or destroyed by fires caused by indoor heating devices.
- Heating with wood results in no net increase in global warming gas emissions. Heating with oil, coal and natural gas is a significant source of global warming gas emissions.

The proposed regulation for “outdoor wood-fired boilers” has the potential to impact my ability to continue utilizing my existing appliance. I am strongly opposed to:

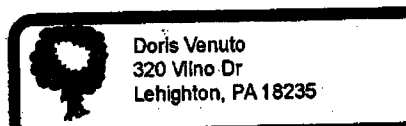
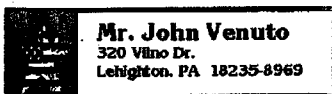
- Excessive chimney height requirements for existing and new furnace installations that are not based upon science.
 - Excessive chimney height requirements are costly (parts and height determination), time consuming and may prevent a large number of owners from being able to comply.
- Seasonal prohibition between May 1 and September 30. A statewide seasonal restriction for rural owners, people with their own wood lots, farming operations, greenhouse operations is unreasonable.
- Opacity requirements for residential sized appliances because opacity is a subjective visual observation.

While it is foreseeable that furnace owners creating verifiable nuisances need to increase their chimney to alleviate complaints, it is unreasonable for the Pa DEP to retroactively impose restrictions (with the exception of proper fuel use) on my existing outdoor wood furnace. My appliance was purchased, installed, and operated in good faith prior to the drafting of the regulation.

I am opposed to the excessive and retroactive requirements of the proposed regulation. If passed as currently written, I believe that the regulation will adversely impact my rights and the rights of existing outdoor wood furnace owners that use these appliances in a responsible manner. I am supportive of a state law requiring existing furnace owners to have to comply with proper fuel use requirements and for regulations regarding new installations to be reasonable.

Sincerely,

John & Doris Venuto
Date: 12/04/2009



Doris

I HAVE OPERATED MY OUTDOOR WOOD FURNACE FOR 4 YEARS. BEFORE MAKING THIS LARGE INVESTMENT (OVER \$16,000.00), I CALLED STATE, COUNTY AND TOWNSHIP OFFICES TO SEE IF THERE WERE ANY REGULATIONS GOVERNING THESE FURNACES (I.E. ZONING, SETBACKS ETC.) AND WAS TOLD ON ALL OCCASIONS THAT THERE WERENT ANY. NOTHING. MY UNIT WAS MANUFACTURED IN THE U.S., I BOUGHT IT LOCALLY, HAD IT INSTALLED BY SELLING DEALER ACCORDING TO MANUFACTURERS RECOMMENDATIONS AND MOST IMPORTANT, MY FUEL SUPPLY IS PURCHASED LOCALLY. I LIVE IN A RURAL AREA (FRANKLIN TOWNSHIP-CARBON COUNTY) BUT AM ONLY ON 1 ACRE. I LIVE DOWNHILL OF MY NEIGHBORS. IF I AM NOT COMPLETELY GRANDFATHERED, I WILL NOT BE ABLE TO USE MY FURNACE. I WOULD NOT BE ABLE TO MEET CHIMNEY OR SETBACK REQUIREMENTS. I'VE HAD NO COMPLAINTS FROM MY NEIGHBORS SINCE THE FURNACE WAS INSTALLED, ONLY INTEREST IN HOW IT OPERATES. SINCE THIS UNIT WAS INSTALLED PRIOR TO ANY KIND OF REGULATIONS, I MUST BE FULLY GRANDFATHERED TO BE ABLE TO USE MY UNIT. IT IS ONLY FAIR AND RIGHT AFTER SUCH A LARGE INVESTMENT. I DO NOT BURN GARBAGE. THE RESIDUE FROM BURNING GARBAGE IS CORROSIVE TO THE FIREBOX SO ANYONE WHO DOES IS FOOLISH, AND MY WOOD SUPPLY IS RENEWABLE AND LOCAL, NO MONEY GOING TO FOREIGN PLACES.

Thank you in advance

John & Doris Venuto

610. 377-9078

