



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF AIR QUALITY
Director's Office

410 Willoughby Avenue, Suite 303
PO Box 111800
Juneau, Alaska 99811-1800
Main: 907-465-5100
Toll Free: 866-241-2805
Fax: 907-465-5129
www.dec.alaska.gov

Via e-mail

June 15, 2017

Subject: Commercial Wood Seller Registration Requirement – Effective August 15, 2017

Dear ELECTED OFFICIAL:

Commercial wood seller registration will soon become mandatory for those selling wood for use in space heating within the Fairbanks North Star Borough (FNSB) PM_{2.5} nonattainment area. The Environmental Protection Agency (EPA) issued a Federal Register Notice¹ on May 10, 2017 redesignating the nonattainment area from 'moderate' to 'serious' effective June 9, 2017. Commercial wood seller registration will become mandatory on August 15, 2017 - 60 days after the ADEC public notice was issued on June 15, 2017.

Background

Portions of the FNSB do not meet the federal health based standards for fine particulate matter (PM_{2.5}), which is found in wood smoke and other combustion source exhausts. The Alaska Department of Environmental Conservation (ADEC), in conjunction with the FNSB air quality program, developed and adopted an Air Quality Plan to begin addressing the PM_{2.5} air pollution problems. The Air Quality Plan and its regulations were adopted in December 2014 and included requirements regarding the sale of fire wood. The Clean Air Act (CAA) requires that the Air Quality Plan contain contingency measures, measures that go into effect if the area failed to meet the air quality standards by December 31, 2015. Unfortunately, the FNSB failed to meet the standard by December 31, 2015 and has been designated by EPA as a serious nonattainment area.

Wood smoke is a leading cause of the air pollution problems in the nonattainment area. One of the contingency measures requires registration of commercial wood sellers in the nonattainment area. The measure was incorporated into regulation in 2014. ADEC subsequently launched a voluntary statewide moisture disclosure program to gain insight on how to improve the wood seller registration program before it became mandatory. Participants in the voluntary program provided valuable feedback and ADEC responded by amending the regulations in 2015.

Commercial Wood Sellers

Registration with ADEC will be mandatory for commercial wood sellers providing wood to a person in the FNSB PM_{2.5} Nonattainment Area. Disclosure of wood moisture through the practices outlined in 18 AAC 50.076 will assist customers in meeting the FNSB and ADEC requirements to burn dry wood (<20% moisture content). Registered commercial wood sellers will obtain proper instruction on the use of moisture meters, wood moisture measurement procedures, moisture disclosure forms, and other requirements of the

¹ 82 FR 21711 (<https://dec.alaska.gov/air/anpms/comm/docs/2017-09391-CFR.pdf>)

program. This requirement does not restrict the sale of unseasoned fire wood or any individual's ability to harvest their own firewood. It only requires the disclosure of the moisture content of all wood sold by commercial wood sellers in the FNSB PM_{2.5} Nonattainment Area.

Detailed information regarding this requirement can be found online at http://burnwise.alaska.gov/moisture_disclosure_program.htm. A summary of the requirements in State regulation 18 AAC 50.076 Commercial wood seller registration program is listed below:

When selling or providing wood to a person located in the FNSB PM_{2.5} Nonattainment Area, a commercial wood seller must:

- (1) be registered with ADEC as a commercial wood seller, a registration application is required and must be renewed every three years (online or in person);
- (2) have a department approved moisture meter (list may be found online);
- (3) have an Alaska business license;
- (4) follow wood moisture measurement procedures (not required if selling wood as 'wet/frozen');
- (5) document details of the sale and measurement results on free triplicate carbon copy disclosure forms;
- (6) provide a copy of the form to the customer at the time of sale;
- (7) provide a copy of all completed forms to ADEC monthly; and
- (8) retain a copy for two years.

Wood sellers may register for free either online or in person at the ADEC Office located at 610 University Avenue, Fairbanks, Alaska.

If you have any questions about this letter or the applicable regulations, you can contact Steve Hoke at (907) 451-5172 or via email at steven.hoke@alaska.gov. Alternatively, you can contact me at (907) 465-5105 or via email at denise.koch@alaska.gov.

Sincerely,



Denise Koch, Director
Division of Air Quality

cc: Cindy Heil, ADEC/NPMS, Anchorage
Molly Birnbaum, ADEC/NPMS, Anchorage
Steve Hoke, ADEC/NPMS, Fairbanks
Alida Bus, ADEC/Legislative Liason, Juneau
Alice Edwards, ADEC/Deputy Commissioner, Juneau
Larry Hartig, ADEC/Commissioner, Anchorage