



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Environmental
Conservation**

DIVISION OF AIR QUALITY
Director's Office

610 University Avenue
Fairbanks, Alaska 99709-3643
Main: 907.451.5173
Fax: 907.451.2187
<http://www.dec.state.ak.us>

Via e-mail

June 9, 2016

Subject: Commercial Wood Seller Registration Soon to be Mandatory

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. After the Environmental Protection Agency (EPA) issues a Federal Register Notice redesignating the nonattainment area from 'moderate' to 'serious,' ADEC will provide public notice of the new requirement. Commercial wood seller registration will become mandatory 60 days after the ADEC public notice.

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. 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. Therefore, the EPA will re-designate the area from a moderate nonattainment area to a serious nonattainment area. We expect the EPA to issue a federal register notice and finalize this action in June or July of 2016. 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 in regulation in 2014 and DEC 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 DEC 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 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(c) 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, once reclassified as serious 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 Offices located at 610 University Ave, Fairbanks.

Please note that besides causing a nuisance, coarse and fine particulate matter may cause health problems when people are exposed to harmful concentrations. PM_{2.5} is associated with more severe health consequences than coarse particulate matter (PM₁₀). PM_{2.5} exposure can lead to increased respiratory symptoms (such as irritation of the airways, coughing, or difficulty breathing), decreased lung function, aggravated asthma, development of chronic bronchitis, irregular heartbeat, nonfatal heart attacks, and premature death in people with heart or lung disease. Controlling particulate matter will benefit public health in the community.

If you have any questions about this letter or the applicable regulations, you can contact Alex Edwards at (907) 269-7695 or via email at alex.edwards@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
John Clark, ADEC/NPMS, Anchorage
Alida Bus, ADEC/Legislative Liason, Juneau
Alice Edwards, ADEC/Deputy Commissioner, Juneau
Larry Hartig, ADEC/Commissioner, Anchorage