Department of Environmental Conservation





DIVISION OF AIR QUALITY Air Non-Point & Mobile Sources

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June 13, 2016

Subject: Commercial Wood Seller Registration to be Mandatory - Likely in August or September 2016

Dear Commercial Wood Seller:

The Alaska Department of Environmental Conservation (ADEC) would like to inform you of an upcoming requirement. Commercial wood sellers will soon need to be registered in order to sell or provide wood to a person located within the the Fairbanks North Star Borough (FNSB) PM_{2.5} Nonattainment Area. A commercial wood seller is defined in 18 AAC 50.076(c) as someone who who sells wood for use in space heating. There are exceptions including businesses selling only wood pellets, manufactured compressed wood logs, wood bricks, wood pucks, small bundles of split dry wood (i.e. bundles at gas stations), or those that only sell wood to other commercial wood sellers and not the public.

Portions of 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 exhausts. The Environmental Protection Agency (EPA) will, therefore, redesignate the FNSB PM_{2.5} nonattainment area from a moderate to serious nonattainment area in June or July 2016. After the area is officially redesignated as a serious nonattainement area, ADEC will issue a 60-day public notice before commercial wood seller registration becomes mandatory. After the effective date established by the ADEC public notice (likely in August or September 2016), a commercial wood seller may not sell wood until their registration is finalized.

Registration is free and can be completed now online (<u>http://burnwise.alaska.gov/moisture_disclosure_program.htm</u>) or in person at the ADEC Office located at 610 University Ave, Fairbanks. Forms will be provided to commercial wood sellers at no cost to them. For a wood seller to be able to sell wood, they must 'activate' their registration. Activating registrations may take time, especially if multiple registrations are submitted at the same time, so we encourage you to register early.

This requirement does not limit the sale of unseasoned firewood, it only requires sellers to tell their customers about the moisture content of the wood they are buying so customers can make informed decisions about burning. Wood sellers have several options to meet the moisture disclosure requirements. They can tell the customer the wood is wet/frozen and not make any measurements at all or they can measure the moisture content of the wood and provide the readings to the customer on a form. Only wood that has been measured and has a moisture content less than 20% can be advertised or sold as 'dry' wood.

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.

Detailed information regarding this requirement and how to register for free can be found online at <u>http://burnwise.alaska.gov/moisture_disclosure_program.htm</u>

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 ADEC regulations, you can contact me at (907) 451-5172 or via email at <u>lee.borden@alaska.gov</u>. Alternately, you may contact John Clark at (907) 269-4913 or via email at john.clark2@alaska.gov.

Sincerely,

Lee Borden Environmental Program Specialist

cc: John Clark, ADEC/NPMS, Anchorage Cindy Heil, ADEC/NPMS, Anchorage