

As noted by the Air Quality Advisory Council, new air quality regulations should be proactive. It is my opinion they should also promote newer, clean burning technologies that will allow the citizens of Missoula County to utilize woody biomass, the only major renewable source of energy available to us in the winter. Using wood for energy is carbon neutral, provides local jobs and does not send large amounts of money to other countries. Allowing and promoting the use of woody biomass in clean burning appliances will have the added benefit of reducing the amount of it that burns in slash piles or wildfires.

I believe the proposed regulations are proactive in some respects; I agree with continuing to allow clean burning wood stoves, and with option 2's approach to Outdoor Hydronic Heaters. However, the proposed regulations fall short in two other areas:

- 1) There are an estimated 1300 old style stoves in the air stagnation Zone. Progressive regulations would encourage the estimated 1300 old wood stoves in the Air Stagnation Zone to be swapped out for 1 gram or less solid fuel burning devices. Old stoves produce 30 to 80 grams of emissions. According to the EPA replacing 25 older stoves with EPA certified stoves can reduce the emissions of one ton of particulate per year. If 1000 stoves were replaced that is 40 TONS of particulate reduced in the air stagnation zone.

It would be even more proactive to initiate a wood stove change out program (as demonstrated in Libby) to assist people in installing clean and efficient wood stoves throughout the county. An effective, voluntary change out program could eliminate the need for more regulations.

- 2) The way the proposed regulations are written they are unfairly restrictive on larger clean burning units.

Outside the air stagnation zone the proposed regulations will allow the average wood stove (approximately) 40,000 BTUs to emit 7.5 grams which equates to 1.875 grams per 10,000 BTUs. Yet a wood chip Boiler that produces 700,000 BTUs and would replace 17 wood stoves still has to fit under the average emissions of 7.5 grams per hour and any boiler over 1 million BTUs is held to .1 pounds per hour. To correct this discrepancy I propose that Rule 9.203 (e) read

A solid fuel burning device not included in (a), (b), (c), or (d) above which has been tested by an independent lab using an alternative testing method approved by the department that shows it has a particulate emission rate of less than or equal to **1.4 grams per hour**

per 10,000 BTUs. Before an alternative testing method may be approved, sufficient documentation of the method must be submitted to the department. Approval of an alternative test method is at the sole discretion of the department.

I think it is important to point out that the data showing Missoula's running three year average of PM2.5 is 35  $\mu\text{g}/\text{m}^3$  was collected when the Stimson Bonner Mill was still in operation. We are probably not as close to the limit now as we were when the Bonner Mill operating.

In conclusion, I understand it may be necessary to increase the regulation of solid fuel burning devices in much of Missoula County. However this regulation should be done in such a way that is allows for as much opportunity as possible for our community to utilize the only sustainable, local, renewable, reliable fuel source available, while keeping the air as clean as possible. This combination of values can only be met by proactive regulations that encourage the use of new technology. The current proposed regulations do not meet this challenge.

Sincerely;

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